ARCADIS
Infrastructure, environment, facilities

Imagine the result

Immediate and Remedial Environmental Response Summary Report

Former Milwaukee Die Casting Company
4132 North Holton Street
Milwaukee, Wisconsin

FID# 241228240
BRRTS# 02-41-000023
RCRA ID# WID006102305

March 2009

ARCADIS

Brian J. Mailliet
Project Scientist

Benjamin Verburg, PE, CHMM
Principal Engineer

Immediate and Remedial Environmental Response Summary Report

Former Milwaukee Die Casting Company
4132 North Holton Street
Milwaukee, Wisconsin

Prepared for:
Theresa Slyman

Prepared by:
ARCADIS
126 N. Jefferson St.
Suite 400
Milwaukee
Wisconsin 53202
Tel 414.276.7742
Fax 414.276.7603

Our Ref.:
WI001196.0001

Date:
23 March 2009

Tables

Figures

Appendices

Introduction

ARCADIS was retained by Ms. Theresa Slyman to complete an immediate and remedial environmental response action (response action) at the former Milwaukee Die Casting Company (Resource Conservation and Recovery Act Identification Number [RCRA ID #] WID006102305) located at 4132 North Holton Street in Milwaukee, Wisconsin (the Site). Ms. Slyman owns the property and building that formerly housed the Milwaukee Die Cast Company. The purpose of the response action was to address potential ongoing sources of polychlorinated biphenyl (PCB) contamination. The Wisconsin Department of Natural Resources (WDNR) outlined steps to include in the response action in correspondence dated August 19, 2008. A copy of the correspondence is included in Appendix A.

ARCADIS and Veolia Special Services, Inc. (Veolia) mobilized to the Site on September 3 and demobilized on December 16, 2008. Work completed during the response action include removal of wastes, decommissioning of exterior sumps and interior trenches, mapping of below grade structures, characterization of unknown wastes, storage vessel (e.g., 55-gallon drums, 5-gallon pails, etc.) management, asbestos containing material (ACM) abatement, and regulatory reporting. All the wastes generated during the response action have been removed and disposed of offsite. The building windows and doors have been boarded or secured and a chain-link perimeter fence was installed around the property.

ARCADIS has prepared this Immediate and Remedial Environmental Response Summary Report (Summary Report) to document the work completed during the response action.

Project Background

The sections that follow provide background information for the Site. The information was obtained from reports available at the WDNR Southeast District Headquarters.

Site Location and Description

The Site is located at 4132 North Holton Street in the city of Milwaukee, Wisconsin (Figure 1). The Site covers an area of approximately 3.7 acres. A 70,000 square-foot industrial building exists on the Site. The original building was constructed in 1952,

with a building addition completed in 1964. Most of the northern and southern portions of the site are paved with bituminous concrete. Limited areas of grass are present to the west and east. The topographic relief of the site slopes from the west to the east with an approximate 6 feet elevation difference across the Site. A layout of the Site is shown on Figure 2.

The building is separated into two areas by a concrete masonry block wall. The east portion of the building is the former location of the die cast machines (die cast area). The building sub floor structures including tunnels and trenches are primarily located in this area. The western portion of the building consisted of a former trimming department, a main office area with a basement containing a lunchroom and rest-rooms, and a boiler room. The layout of the facility is shown on Figures 2 and 3.

Site History

The former Milwaukee Die Casting Company produced and machined aluminum and zinc cast parts. Prior to 1981, some of the die casting machines used phosphate ester oil (PEO) hydraulic fluids, which contained PCBs. The PEO was stored on the Site in an underground storage tank (UST) formerly located near the northeastern corner of the building. Spent PEO was stored in an aboveground storage tank (AST) formerly located along the northern exterior wall of the building. The approximate former locations of the PEO AST and UST are shown on Figure 2.

From 1981 until 1997, the die casting machines utilized a water glycol hydraulic fluid. Spent water glycol hydraulic fluids were stored in two fiberglass ASTs. Die casting operations ceased in 1997 and all die casting machines were removed from the Site. Following cessation of die casting operations, trimming department and office areas were occupied by Turner Box Company, which distributed commercial cardboard storage boxes. Turner Box Company vacated the Site on September 26, 2008.

Response Action Contractor Summary

This section is a summary of companies involved in the response action.

Environmental Consultant

ARCADIS U.S., Inc.
126 North Jefferson Street, Suite 400
Milwaukee, WI 53202
Telephone: (414) 276-7742
Project Manager: Ben Verburg, PE, CHMM

PCB Abatement and ACM Removal Contractor

Veolia ES Industrial Services Inc.
1203 Klement Street
Fort Atkinson, WI 53538
Telephone: (920) 568-2521
Project Manager: Robert Leszczynski

Master Plumber

Badger Underground, LLC
W148N7230 Woodland Dr
Menomonee Falls, WI 53051
Telephone: (262) 502-1220
Master Plumber: Jeff Proell (License Number 332242)

Treatment, Storage, and Disposal Facilities

Clean Harbors Deer Park, L.P. (PCB liquid waste)
2027 Independence Parkway South
LaPorte, TX 77571
Telephone: (281) 930-2300
EPA ID: TXD055141378

Lone Star Industries, Inc. (hazardous, water soluble oils)
3301 South County Road 150 West
Greencastle, IN 46135
Telephone: (765) 653-9766
EPA ID: IND006419212

Veolia ES Emerald Park Landfill, LLC (non-hazardous waste and regulated asbestos containing material [RACM])
W124 S10629 124th Street
Muskego, WI 53150
Telephone: (414) 529-1360
EPA ID: WIR000003012

Veolia ES Port Arthur, Texas Treatment Complex (PCB liquid waste)
Highway 73, 3.5 miles west of Taylors Bayou
Port Arthur, TX 77640
Telephone: (281) 425-7126
EPA ID: TXD000838896

Veolia ES Technical Solutions, LLC (hazardous waste)
W124 N9311 Boundary Road, Site B
Menomonee Falls, WI 53150
Telephone: (800) 255-5092
EPA ID: WI0000093880

Laboratories

Micro Analytical, Inc. (asbestos)
11521 West North Avenue
Milwaukee, WI 53226
Telephone: (414) 771-0855
National Voluntary Laboratory Accreditation Program Lab Code 101247-0

TestAmerica, Inc. (Volatile organic compounds [VOCs], PCBs, Waste Characterization)
602 Commerce Drive
Watertown, WI 53094
Telephone: (920) 261-1660
Wisconsin Certification Number 128053530

Regulatory Coordination

The objective of the response actions was to address potential ongoing sources of PCB releases. The following bulleted list is a summary of the steps requested by the WDNR in the August 19, 2008, correspondence to include in the response action:

- Take actions necessary to stop discharges to the two exterior sumps and prevent any overflows of the sumps.
- Prevent further discharges to the environment from the sub-floor structures beneath the building. Evaluate other potential sources of conduits for continuing release(s) of to the environment.
- Take additional actions, as necessary, to address the other potential sources of ongoing release(s) to the environment.
- Provide the WDNR project manager (PM) with updates and reporting to document the progress of the response action.

During execution of the response action, ARCADIS provided daily updates and held numerous meetings with Ms. Pamela Mylotta (WDNR PM) and Mr. Bradley Grams U.S. EPA Region 5). During these meetings, ARCADIS provided a summary of the proposed scope of work to address the potential ongoing releases. Other stakeholders (the Milwaukee Metropolitan Sewerage District [MMSD], the city of Milwaukee Department of Neighborhood Services [MDNS]) were invited by the WDNR and U.S. EPA to participate in these meetings.

Response Action Overview

The sections that follow are a summary of the response action. The sections are organized as follows:

- ACM Removal.
- Below-Grade Structure Assessment.
- PCB Source Abatement.

- Site Control Measures.

ARCADIS maintained a mobile office and a full-time supervisor was onsite throughout the response action. Proper health and safety practices were a key element during the response action. Health and safety plans were generated by ARCADIS and Veolia and addressed the specific activities. All personnel were required to sign-in/sign-out prior to entering/leaving the Site. Mandatory personnel protective equipment included hard hat, traffic vest, safety glasses, and steel toed boots. Tailgate safety meetings were conducted at the start of each day. ARCADIS also reviewed all waste profiles and manifests and documented all activities.

Supporting documentation is included in appendices to this Summary Report. Documentation included in the appendices includes:

- Appendix B: Waste stream profile and manifest documentation.
- Appendix C: Photographs.
- Appendix D: ACM Report and abatement documentation.
- Appendix E: Water Sample laboratory analytical reports.
- Appendix F: Field waste characterization documentation.
- Appendix G: Waste characterization sample laboratory analytical reports.
- Appendix H: Property boundary survey.

ACM Removal

Veolia conducted an asbestos inspection of the building in 2005. A copy of the Veolia inspection report *Asbestos Assessment/Supplemental Inspection and Bulk Sampling* is included in Appendix D. Friable and Category I and II ACM were identified in the building. Friable ACM was identified in the boiler room; in thermal systems insulation (TSI) and pipe fittings throughout the building; and three asbestos debris piles in the die cast area.

The objective of the ACM removal was to remove the three debris piles and all friable TSI and pipe fitting ACMs located in the building. The TSI was in poor condition and the damaged ACM could potentially release asbestos fibers during the response action. The ACM in the boiler room and Type I or Type II non-friable ACMs were not addressed during the response action.

On September 5, 2008, an ACM abatement notification form (Form 4500-113) was submitted to the WDNR. Following the mandatory 10-day WDNR review period, Form 4500-113 and an asbestos project permit application was submitted to the MDNS on September 15. The MDNS approved the permit on September 19. The notifications and permits are included in Appendix D.

The door and metal fenced wall opening to the boiler room was secured on September 18, 2008. This consisted of boarding up the boiler room door and securing plastic over the metal fenced wall opening. Asbestos hazard signs were placed on the boarded door and plastic covered wall opening. This work was completed at the request and under the direction of the MDNS.

On September 19, 2008, the ACM abatement activities were initiated. The following bulleted list summarized the ACM removal scope of work:

- Establish ACM abatement containment, as required.
- Remove approximately 2,000 linear feet of friable TSI ACM, 200 ACM pipe fittings, and three ACM debris piles.
- Conduct personnel monitoring and clearance testing including asbestos sampling and analysis.

ACM removal activities were completed in the die cast area between September 19 and 27, 2008. The trimming department ACM removal activities were completed between September 29 and October 7, 2008.

ACM Containment Construction

All exterior doors and windows to the building were closed and/or secured during the ACM removal activities and abatement exclusion zones were established. The die cast

area abatement exclusion zone was isolated from the other portions of the building by closing and securing all interior access doors. The TSI ACM in the trimming department was limited to the southern half of the building. The trimming department abatement exclusion zone consisted of a containment curtain hung to isolate the southern half from the remainder of the building. An asbestos decontamination shower and decontamination zone was established to provide access to the die cast and trimming department abatement exclusion zones. All personnel that entered the exclusion zones were required to be in Level C personnel protective equipment, which included Tyvek protective clothing, gloves, and a full-face respirator with particulate cartridges.

The die cast and trimming department abatement exclusion zones remained under containment until post-asbestos abatement air samples were collected and verified air clearance.

ACM Removal and Disposal

Approximately 460 linear feet of TSI ACM was removed from piping runs in the die cast area. Following removal of the TSI ACM, the floors beneath the piping runs were swept to remove the ACM that could potentially have fallen from the piping runs. All ACM collected from the die cast area was placed into sealed, asbestos-labeled, disposal bags, which were placed into cubic yard boxes. Due to the observed oil staining on the outside of the material, the ACM removed from the die casting area was characterized as a Toxic Substances Control Act (TSCA)-regulated waste stream with concentrations of PCBs greater than the 50 parts-per-million (ppm) threshold for disposal as a non-hazardous special waste. Additional information on the disposal of this waste is included in the PCB Source Abatement section of this report.

Approximately 1,525 linear feet of TSI ACM and 72 fittings were removed from piping runs in the trimming department. All ACM collected from the trimming department was placed into sealed, asbestos-labeled, disposal bags, which were placed into a lined 42 cubic yard roll-off box. On October 8, 2008, the 42 cubic yard roll-off box was transported offsite with a signed manifest for disposal at the Veolia Emerald Park Landfill in Muskego, Wisconsin. The landfill reported a total of 4.49 tons of ACM with this manifest. The manifest and landfill weight ticket are included in Appendix D.

ACM Abatement Air Monitoring

The following air samples were collected as part of the ACM removal activities:

- Pre-abatement background air samples from each die cast and trimming department area.
- Daily continuous air monitoring samples from personnel performing abatement activities.
- Daily continuous air monitoring samples from the decontamination station area.
- Post-abatement air samples from each die cast and trimming department area.

All air samples were submitted for laboratory analysis of asbestos (polarized light microscopy [PLM] method). The air clearance laboratory analytical results were below the MDNS regulatory clearance criteria. A copy of the air monitoring data is included in Appendix D.

Below-Grade Structure Assessment

Prior to conducting the PCB source abatement, the layout and condition of the trenches, floor drains, and tunnel and sewer networks were inspected and physically mapped on September 12, 2008. A layout of the sewer networks are shown on Figure 2. A layout of the trenches, floor drains, and tunnels in the die cast area is shown on Figure 3. Table 1 is a summary of the sewer manholes, sewer and tunnel sumps, and tunnel drains. The trenches, floor drains, tunnels, and sewers inspection findings are discussed in the following sections.

Trenches

The following observations were made during the inspection of the trenches:

- Four concrete trenches (Trench #1 through Trench #4) are located in the die cast area and are approximately 2 feet wide and 2 feet deep and varied in length.

- Prior to decommissioning, each trench contained approximately 18 inches of sludge/debris with some oil.

Floor Drains

The following observations were made during the inspection of the floor drains:

- Two concrete lined floor drains are located in the southeast corner of the building and are approximately 2 feet wide and 4 inches deep.

- A sump (IS5) is located in the middle of the south floor drain section. This sump was abandoned, filled with concrete to the surface grade. The date for the abandonment of this sump is unknown.

Main Tunnel System

The main tunnel system consists of two north/south oriented runs (the west main tunnel and east main tunnel) that are approximately 175 feet in length and connected on the southern ends by a 50 foot tunnel (the south main tunnel). Three east/west lateral tunnels (the north, middle, and south main tunnels) branch from the east main tunnel. At the eastern end of the south main tunnel is a 15-foot by 15-foot vault.

The following observations were made during the main tunnel system inspection:

- The west and south main tunnels are approximately 8 feet in depth. The southern half of the east main tunnel deepens to a depth of 9 feet before converging with the south main tunnel. The remaining tunnel network is approximately 9 feet in depth. The depth of the vault located along the east wall of the building is approximately 14 feet deep.

- One 4-inch diameter drain (TD1) is located in the tunnel floor where the south main tunnel converged with the east main tunnel (Figure 3). A second 4-inch diameter drain (TD2) is located in the vault. Both tunnel floor drains appear to be connected to a pipe (tunnel drain lateral) that was routed through the east wall of the building to the exterior south sump.

- Two-foot deep concrete sumps were located at the southern end of the west main tunnel (IS4) and in the vault (IS3). No outflow or inflow piping was noted in the concrete sumps and both contained inactive sump pumps connected to hoses, which were routed toward the tunnel floor drains (TD1 and TD2).

- The main tunnel system floors are covered with approximately 2 to 4 inches of water with isolated areas of oil sheen and visible sludge. Multiple piping runs varying in size from 2-inches to 6-inches in diameter are located throughout the main tunnel system. Several empty piping runs have been severed and left uncapped.

- One concrete lined sump (IS2) is located approximately 15 feet west of the west main tunnel and was filled with oily water. This sump was approximately 2 feet in diameter and 4 feet in depth. A 4-inch pipe was observed at the bottom of IS2, which exited through the eastern side of the sump.

- The main tunnel system was accessible via nine tunnel access manholes that measured approximately 2 feet by 3 feet.

Access Tunnels

The three access tunnels (western access tunnel, middle access tunnel, and eastern access tunnel) were located in the die cast area. Each tunnel was oriented in a north/south direction, approximately 3 feet in width, and varied in length. The following observations were made during the inspection of the access tunnels:

- The southern third of each tunnel is approximately 2.5 feet in depth, with the remainder of the tunnel deepening to a depth of approximately 4 feet below the top of the floor slab.

- With exception to the middle access tunnel intersection with Trench #3, no piping runs exist in any of the access tunnels.

- The western and middle access tunnels are accessible via manholes that measured approximately 2 feet by 2 feet. The eastern access tunnel is only accessible via 6-inch diameter ports. The top rim of each 6-inch port is at least 3 inches above the surrounding grade.

- The western access tunnel contains 2 to 4 inches of sludge with some oil; the middle access tunnel contained 6 inches of oily sludge; and the eastern access tunnel contained 12 inches of oily sludge.

Sanitary Sewers

The inspection of the sanitary sewers indicated that there are two sanitary sewer lines (SAN #1 and SAN #2) with a total of five sanitary sewer manholes or sumps. The layout of SAN #1 and SAN #2 is shown on Figure 2. The following observations were made during the inspection of the sanitary sewers:

- SAN #1 appeared to receive liquid from the tunnel drain lateral, which discharged into the south sanitary sump (SSS) that is adjacent to the exterior of the east building wall.

- An oil/water weir on the northern side of SSS was connected to a lateral, which ran approximately 120 feet north and discharged into the north sanitary sump (NSS).

- An outlet on the eastern side of the NSS was connected to a lateral, which ran approximately 30 feet to the east and discharged into the northern public sanitary sewer interceptor. Under the direction of the MMSD, the site owner removed the lateral and bulkheaded the outlet in August 2008.

- SAN #2 appears to include three manholes (SANMH1 through SANMH3) located in the southern portion of the building. Each manhole was filled with water, which prevented a thorough inspection.

- Two laterals from the south and east were visible in the western manhole (SANMH3) of SAN #2.

- A lateral from the west was observed in the middle manhole (SANMH2) of SAN #2. This east/west lateral appeared to be in line with the eastern manhole (SANMH1) of SAN #2, which was filled with water and debris.

- SANMH1 was in line with the southern public sanitary sewer system inceptor located to the east of the Site. Under the direction of the MMSD, the site owner removed the lateral and bulkheaded the outlet in August 2008.

Storm Sewers

The inspection of the storm sewers indicated that there are two storm sewer lines (STM #1 and STM #2) and eight catch basins at the Site. The layout of STM #1 and STM #2 is shown on Figure 2. The following observations were made during the inspection of the storm sewers:

- STM #1 is located north of the building and is connected via an east/west lateral to STMH1 and STMH2.
- STM #2 is located in the southern area of the building interior.
- A storm sewer lateral that discharges into the public storm sewer system to the east of the Site is in-line with the STMH5.
- All but two catch basins are filled with leaves, soil, and debris.

PCB Source Abatement

The objective of this scope of work was to evaluate and address the solid, liquid, and mixed waste containers and the residual PCB-laden oils and sediment in the trenches, sumps, and the tunnel and sewer networks. In accordance with CFR Title 40, Subpart D, § 761.77, the former Milwaukee Die Casting Company submitted a notification of PCB activity to the U.S. EPA on October 21, 2008 (RCRA ID # WID006102305). A copy of this notification is included in Appendix A. The PCB source abatement included the following activities:

- Prepare an addendum to the site specific Health and Safety Plan to address the PCB source abatement and confined space entry of the tunnels and sumps.
- Immediate removal of PCB Oily Water from the north and south sumps.

- Decommission and seal the north and south sumps and plug the main tunnel drains.
- Clean the die cast area concrete floors, trenches, and northwestern sump.
- Remove oily water and debris from the three access tunnels.
- Inventory, sampling, and disposal of drums, containers, tank bottoms, and other storage vessels.
- Characterization and profiling of the waste materials.
- Prepare waste materials and containers for transportation by bulking, packaging, and over-packing methods.

The following sections summarize the activities completed as part of this response action.

Health and Safety Addendum

ARCADIS prepared a site-specific Health and Safety Plan (HASP) for the response actions. Tunnel openings, piping, and holes were marked and delineated using a combination of orange paint and caution tape. ARCADIS and Veolia personnel completed a daily tailgate health and safety briefing prior to conducting onsite activities.

The main tunnel mapping, sump decommissioning, and access tunnel cleaning activities were completed under a confined space entry permit. An air monitoring program was implemented during the confined space entries. Prior to entering the tunnels and sumps, a MSA Solaris four gas meter was lowered into the tunnels and sumps to monitor the percentage of lower explosive limit (LEL), oxygen, carbon monoxide (CO), and hydrogen sulfide (H_2S) concentrations of the ambient atmospheres. Neither a percent LEL nor concentrations of CO and H_2S were recorded in tunnels and sumps.

Personnel entered the tunnels and sumps in Level C, which included Tyvek protective clothing, gloves, and a full-face respirator with organic and particulate cartridges. Continuous monitoring of the ambient atmospheres was conducted with the four gas

meter and an organic vapor analyzer flame ionization detector (FID). The air concentrations recorded by the four gas meter did not change from the pre-entry levels. The FID recorded sustained organic vapor readings ranging from 31 to 101 parts per million (ppm). Based on the organic vapor readings, personnel remained in Level C while in the tunnels and sumps.

North and South Sumps

On July 29 and 30, 2008, Environmental Audits removed a total of ten 55-gallon drums of PCB impacted water from SSS. The PCB impacted water was shipped off-site by Safety-Kleen Systems, Inc. for disposal at the Clean Harbors disposal facility in Deer Park, Texas. Copies of the manifest from this removal action are included in Appendix B.

On September 3, 2008, one 1,200 gallon and one 2,000-gallon plastic AST was mobilized to the Site and placed inside the die cast area. Approximately 1,200 gallons of PCB oily water was removed from NSS and SSS using hoses connected to a vacuum tanker truck. Following the removal of the PCB oily water from SSS, ARCADIS observed oily water discharging into the sump from the tunnel drain lateral.

The PCB oily water from the sumps was transferred from the vacuum tanker truck to the 2,000-gallon plastic AST, which was staged within plastic sheet containment with oil boom berms. Following the transfer, the vacuum tanker truck and hoses were triple rinsed and approximately 200 gallons of rinse water were transferred to the 2,000-gallon AST.

On September 4, 2008, Clean Harbors mobilized to the Site and removed the 1,400-gallons of PCB oily water from the Site using hoses connected to a vacuum tanker truck that was PCB-dedicated. In addition, the Clean Harbors vacuum tanker truck was used to remove approximately 3,000 gallons of oily water from the main tunnel system. The PCB oily water was hauled in the Clean Harbors vacuum tanker truck to the Clean Harbors Deer Park Disposal Facility for incineration. The disposal manifest is included in Appendix B.

Decommissioning and Sealing of North and South Sumps and Plugging of Tunnel Drains

On September 10, 2008, a confined space entry crew and master plumber mobilized to the Site to decommission and seal NSS and SSS. Both sumps had recharged with approximately 4 feet of oily water since September 3. Hoses connected to a vacuum tanker truck were used to remove the PCB oily water. Following removal of the PCB oily water, the sumps were triple rinsed/cleaned with a hot water pressure washer.

The decommissioning of the sumps resulted in the generation of approximately 1,400-gallons of oily water, which was transferred to the 2,000-gallon plastic AST. Following the transfer, the vacuum truck and hoses were triple rinsed and approximately 200-gallons of rinse water were transferred to the 2,000-gallon AST. Following the cleaning of the sumps, a master plumber entered the sumps, mapped and plugged the inlet and outfall. The MDNS was onsite and approved the sealing work.

During the September 12, 2008 inspection of the main tunnel system, the two tunnel floor drains were each plugged with two 50 pound containers of hydraulic water-stop cement. The plugging of the tunnel floor drains effectively abandoned the tunnel drain lateral that had been discharging into SSS.

Following the sealing of the sumps and plugging of the tunnel floor drains, water recharged into the sumps and tunnels from infiltration of groundwater and surface water sources. The recharged water in the sumps reached a static level on October 6, 2008, with each sump containing approximately 9 feet of water. On October 8, 2008, the water in the main tunnel system reached a static level, with an average of 5 feet of water (estimated at 90,000 gallons) throughout the main tunnel system.

The WDNR and U.S. EPA were notified of the water that had accumulated in the sumps and tunnels and performed site inspections on October 23 and November 6, 2008. On November 12, 2008, ARCADIS collected water samples from each sump and the main tunnel system and submitted the samples for laboratory analysis of VOCs. The laboratory analytical results indicated that the water samples contained chlorinated VOC concentrations that exceeded ch. NR 140 regulatory criteria. Previous groundwater investigations have indicated that tetrachloroethene (PCE) is the primary constituent of concern at the Site. The PCE concentrations in the water

samples collected from the sumps and tunnels ranged from 0.79 micrograms per liter (µg/L) to 13 µg/L.

On November 19, 2008, ARCADIS collected water samples from each sump and the main tunnel system and submitted the samples for laboratory analysis of PCBs. The laboratory analytical results indicated that the water samples contained total PCB concentrations ranging from 9.2 µg/L to 99.4 µg/L, which is above the MMSD discharge limit of 3 µg/L, but below the 200 µg/L limit allowed for wastewater disposal via a closed system non-contact application per CFR Title 40, Subpart D, § 761.79(b)(1)(i). The total PCB concentrations were also below the decontamination standard for liquid waste (2.0 ppm) per CFR Title 40, Subpart D, § 761.79(b)(2). The water sample analytical results are summarized in Table 2. The water analytical reports are included in Appendix E.

Cleaning of the Die Cast Area Concrete Floors, Trenches, and Northwestern Sump

Between September 30 and October 8, 2009, industrial floor sweeper/cleaner machines were used to remove the layers of oil, dirt, and girt from the floors. The sweeping process generated three cubic yards of dirt and grit (floor sweepings). The subsequent cleaning process used an industrial soap solution to scrub the floors, removing any free oil. This process generated a total of approximately 900 gallons of PCB oily water, which was stored in four 275-gallon totes. Following the cleaning of the floors, the industrial floor sweeper and cleaner machines were tripled rinsed and the resulting rinse water was incorporated into the PCB oily water totes.

On October 9, 2008, shovels/digging tools were used to remove the sludge/debris from the four trenches (trench sweepings). This process generated thee cubic yard boxes of trench sweepings. On October 13, 2008, the trenches were pressure washed with hot water while using hoses connected to a vacuum tanker truck to remove the resulting rinse water. All of the oily water in the northwestern sump (IS2) was also removed using hoses connected to the vacuum tanker truck. These activities generated approximately 800 gallons of PCB oily water, which was transferred into the 1,200-gallon AST. Following the transfer, the vacuum tanker truck and hoses were triple rinsed and the resulting rinse water was transferred into the 1,200-gallon AST.

Access Tunnels

On November 19, 2008, the confined space entry crew cleaned the western and middle access tunnels. Hoses connected to a vacuum tanker truck were used to remove the sludge. Following removal of the sludge, the access tunnels were cleaned using a hot water pressure washer and the hoses connected to the vacuum tanker truck. These activities generated approximately 1,600 gallons of PCB oily water, which was transferred into the 2,000-gallon AST. Following the transfer, the vacuum tanker truck and hoses were triple rinsed and the resulting rinse water was transferred into the 2,000-gallon AST.

Waste Characterization and Profiling

The waste characterization activities included field characterization, desktop reviews, and laboratory analyses of the waste streams at the Site. The following sections summarize the waste characterization activities.

Field Characterization of Waste Streams

Field characterization activities were completed in accordance with Veolia's *Unknown Characterization Procedures, Suspect Chemical Non-Biological,* dated March 2007. Field characterization activities were conducted under direct supervision by ARCADIS. A copy of Veolia's waste characterization procedures is included in Appendix F. Both physical and chemical characterization methods were used to identify the existing and generated waste streams at the Site. The physical characterization activities included locating and inspecting the waste materials, visually noting the physical state of the media (ie, liquid, solid, sludge, etc.), the size and condition of the container (if applicable), and any visual markings or product names. The physical characterization activities identified the following waste materials at the Site:

- Approximately 650 wooden pallets located in the die cast area.
- Oily water and sludge contained in the north, south, and northwestern sumps; the main tunnel system; and the three access tunnels.
- Four 275-gallon totes of oily water from the cleaning of the floors in the die cast area.

- Oils and liquids stored in 33 55-gallon drums, six 30-gallon drums, one 10-gallon kettle, 37 5-gallon containers, and one 1,500-gallon plastic AST. These containers were located in the die cast area.

- White powder, metal fines, oil/sludge, and miscellaneous oil-covered debris (hoses, boards, glass, etc.) intermingled with floor sweepings stored in thirty-one (31) 55-gallon drums, eight 5-gallon containers, one 6-gallon container, one 15-gallon drum, one 30-gallon drum, and one 40-gallon spill box. These containers were located in the die cast area.

- Three empty 55-gallon drums and two 250-gallon empty totes located in the die cast area.

- Four cubic yard boxes of miscellaneous oil-covered debris (hoses, boards, glass, etc.) intermingled with floor sweepings. These boxes were located in the die cast area.

- Six cubic yards boxes of floor and trench sweepings from the cleaning of the die cast area floors and trenches.

- Tank bottom sludge in two 1,500-gallon plastic ASTs located in the die cast area.

- Six cubic yard boxes of oil-stained TSI ACM from the die cast area.

The sumps, tunnels, drums, containers, and ASTs were each assigned an identification number. In addition, an identification number was assigned to the lot of 650 pallets, the four cubic yard boxes of miscellaneous oil-covered debris, the six cubic yard boxes of floor and trench sweepings, and the six cubic yard boxes of oil-stained TSI ACM. The inventoried waste materials are summarized in Table 3.

Aliquots were collected from each waste material for field chemical characterization, with the following exceptions:

- Wooden pallets, which were characterized by laboratory analytical results (see following section).

- Oily water and sludge from the north, south, and northwestern sumps and the floor cleaning process that were assumed to be a PCB impacted oily water (based on June 3, 2008 analytical results from MMSD).

- Three 55-gallon metal drums of emulsified petroleum oil that were unopened, sealed, and clearly identified with a product name (Die Slick Oil 914).

- Miscellaneous oil-covered debris (hoses, boards, glass, etc.) intermingled with floor sweepings, tank bottom sludge, and drum/container skins that were assumed to be PCB impacted debris.

- Oil-stained TSI ACM piping runs that were assumed to be PCB impacted debris.

The chemical characterization procedures included the field testing of each aliquot for pH, air reactivity, water reactivity, water solubility, combustibility, flammability, and the presence of halides, alcohols/aldehydes, an oxidizers, sulfides, and peroxides. The waste materials were segregated into compatible groups according to the physical and chemical characterization results. The field physical and chemical characterization results are summarized on worksheets included in Appendix F.

In general, the liquid waste materials were characterized as acidic, caustic, and combustible liquids, and water soluble, non-water soluble, and non-water soluble flammable oils. A majority of the liquids were either water soluble or non-water soluble oils contained in the 55-gallon drums and 1,500-gallon AST, and non-water soluble flammable oils contained in the access tunnels. Aliquots from each oil waste stream were composited to evaluate for unexpected reactions. No reactions associated with incompatibility were noted.

Field and Desktop PCB Results

In order to evaluate the of PCBs in the water soluble and non-water soluble oil waste streams, a composite sample was collected and field characterized for PCBs using Clor-N-Oil testing kits. The test kits provide an indication whether the non-water soluble and non-water soluble flammable oils contained a PCB concentration greater than 50 ppm. The PCB concentration of the water soluble oils was less than 50 ppm. Due to test kit reagent reactivity issues, the liquid waste streams that were

characterized as acidic, caustic, and combustible were not tested for PCBs using the Clor-N-Oil kits.

Aliquots of the floor sweepings and white powder were also field characterized for PCBs using Clor-N-Soil testing kits. The test kits indicated that the floor sweepings contained a PCB concentration greater than 50 ppm. The PCB concentration of the white powder was less than 50 ppm. Due to test kit reagent reactivity issues, a solid waste stream that was characterized as combustible was not tested for PCBs using the Clor-N-Soil kits. The field PCB characterization results are summarized on the worksheets included in Appendix F.

To determine the PCB concentrations of the remaining liquid and solid wastes, Material Safety and Data Sheets (MSDS) databases were searched using the observed markings or product names on the containers/drums. This search identified MSDSs for six chemicals. The MSDSs are included in Appendix F. A review of the MSDSs revealed the following information:

- One 5-gallon container of Multi-therm PG-1 Heat Transfer is not a TSCA waste.
- Three 55-gallon metal drums of Die Slick Oil 914 emulsified petroleum are not a TSCA waste.
- One 5-gallon container of Oakite Enprox 714 is not a TSCA waste.
- One 5-gallon container of Protecto Kote 45 is not a TSCA waste.
- One 30-gallon container of Metsil 1296 is a listed TSCA waste.
- One 5-gallon container of Process 227 Cleaner is a listed TSCA waste.

Laboratory Analysis of Waste Streams

The following waste streams were sampled and submitted to TestAmerica for Waste Disposal Characterization Protocol B (Protocol B) laboratory analysis:

- Acidic liquids from two drums (Sample ID: #6 acid).

- Caustic white powder from one drum (Sample ID: Misc. Solids #19).
- Water soluble oils from one AST and 25 drums (Sample ID: #7 Water Soluble Oil).
- Non-water soluble flammable oils from the three access tunnels and northwestern sump (Sample ID: #5 Flammable).
- Non-water soluble oils from five drums (Sample ID: #8 Oil).
- Flooring and trench sweepings (Sample ID: Misc. Solids #3).
- Floor sweepings from drums and cubic yard boxes (Sample ID: Misc. Solids #1).
- Metal fines from eight drums (Sample ID: DR8-MS-WS).

The Protocol B analytical results are summarized in Table 4. The analytical reports are included in Appendix G. The analytical results were compared to RCRA and TSCA regulatory criteria, which indicated the following:

- Acidic liquid, caustic white powder, and metal shaving waste streams were non-hazardous and non-TSCA regulated wastes.
- Non-water soluble flammable oils were not a RCRA flammable waste (flashpoint greater than 200 degree Fahrenheit). Therefore, the oil in the access tunnels was characterized as a non-water soluble oil waste stream.
- Non-water soluble oil waste stream was a non-hazardous TSCA regulated waste.
- Trench and Floor sweeping waste stream was a non-hazardous TSCA regulated waste.
- Floor sweepings from the drums and cubic yard boxes were a non-hazardous and non-TSCA regulated waste. It is noted that the floor sweepings were mixed with miscellaneous PCB impacted debris. Given the difficulty in segregating the floor sweepings from the PCB impacted debris, all floor sweepings were assumed to be a TSCA regulated waste.

- Water soluble oil waste stream was a RCRA selenium characteristic hazardous waste.

A sample was collected from the wooden pallets and submitted for PCB laboratory analysis. The sample was collected from stained pallets to obtain a worst-case concentration of PCBs in the waste stream. Analytical results indicated that the wood sample contained a total PCB concentration of 31.6 milligrams per kilogram, which indicated that the pallets were a non-TSCA waste stream. The Protocol B and wood sample analytical results are summarized in Table 4.

Waste Characterization Findings and Profiles

Waste streams that were not field or laboratory analyzed for PCBs with no MSDS documentation were assumed to be a TSCA waste per CFR Title 40, Subpart D, § 761.(a)(5)(i)(B)(2)(i). The waste characterization activities resulted in the identification of the following 16 waste streams at the Site:

Non-Hazardous Waste Streams

- Acidic Liquid
- Caustic White Powder
- Emulsified Petroleum Oil
- Solid Waste, including wooden pallets
- Metal Fines

TSCA Waste Streams

- PCB/RACM: Including TSI ACM from the die cast area.
- PCB Oily Water: Including water from the sumps, access tunnels, and non-water soluble oils.

- PCB Impacted Debris: Trench sweepings, floor sweepings, white powder, tank bottom sludge, miscellaneous oil-covered debris intermingled with floor sweepings, and empty drum/container skins.

Hazardous Waste Streams

- Selenium Characteristic Water Soluble Oil (RCRA Characteristic Hazardous Waste Code [RCRA] D010)
- Caustic Liquid (RCRA D002)
- Combustible Liquid (RCRA D001)

TSCA/Hazardous Waste Streams

- Caustic PCB Liquid (RCRA D002)
- Caustic Combustible PCB Liquid (RCRA D001, D002)
- Caustic Peroxide PCB Liquid (RCRA D001, D002)
- Combustible PCB Solid (RCRA D001)
- Combustible Sulfide PCB Liquid (RCRA D001, D003)

Profiles were generated for the waste streams and submitted to the property owner for signature. Signed profiles were subsequently submitted to the waste disposal facility for approval. The waste stream profiles and disposal facility approval letters are included in Appendix B.

Preparing Waste Materials and Containers for Transportation

The 16 waste streams were prepared for transportation in accordance with the Department of Transportation (DOT) Hazardous Materials Regulations (HMR) in 49 CFR parts 171 through 180. The following is a summary of the waste preparation activities:

- Due to poor drum/container condition, all acidic liquid, caustic white powder, caustic liquid, combustible liquid, caustic PCB liquid, caustic combustible PCB liquid, caustic peroxide PCB liquid, combustible PCB solid, and combustible sulfide PCB liquid waste streams were placed into 85 gallon, 35 gallon, and 14-gallon overpack drums (according to size) for transportation off-site.

- Emulsified petroleum oil drums were in good condition and required no overpacking for transportation off-site.

- Wooden pallets were loaded into a total of three 20-cubic yard roll-off boxes. The roll-off boxes were covered prior to transportation off-site.

- The nine drums of metal fines were in good condition. The open drum tops were covered prior to transportation off-site.

- The PCB/ACM was placed into lined cubic yard cardboard boxes. The cardboard boxes were sealed prior to transportation off-site.

- The PCB oily water in the drums/containers was transferred into one 275-gallon plastic tote using a waste oil transfer pump. The PCB oily water was transferred via a vacuum hose to a PCB-dedicated vacuum tanker truck for transportation off-site.

- The PCB oily water from the floor cleaning activities was placed into four 275-gallon plastic totes. The PCB oily water was transferred via a vacuum hose to a PCB-dedicated vacuum tanker truck for transportation off-site.

- The PCB oily water from the trench, sump, and access tunnel cleaning activities were placed into 1,200-gallon and 2,000-gallon plastic ASTs. The PCB oily water was transferred via a vacuum hose to a PCB-dedicated vacuum tanker truck for transportation off-site.

- The PCB impacted debris was placed into five 20-cubic yard roll-off boxes. The roll-off boxes were covered prior to transportation off-site.

- The selenium characteristic water soluble oil in the drums/containers was transferred into four 275-gallon plastic totes using a waste oil transfer pump. The

selenium characteristic water soluble oil was transferred via a vacuum hose to a vacuum tanker truck for transportation off-site.

Following removal of the PCB oily water and water soluble oil waste streams, all plastic totes and ASTs were cut into three foot pieces and placed into the PCB impacted debris waste stream roll-off boxes. All shipping containers and waste transportation and tanker trucks were labeled in accordance with 49 CFR 172.101. The waste shipping manifests were completed in accordance with U.S. EPA and DOT regulations and were signed by the generator, transporter, and designated facility. Copies of the signed manifests are included in Appendix B.

Waste Disposal Summary

All 16 waste streams were transported off-site for disposal in accordance with state and federal regulations. All waste streams that were placed into overpack drums were weighed on-site prior to removal. The remaining waste stream volumes were estimated at the Site, with the actual waste stream volume determined at the disposal facility weigh station. Each waste stream that was removed from the Site was tracked from date of generation to certificate of disposal/destruction. The waste stream volumes, generated manifest, and waste tracking information are summarized in Table 5. The following is a summarized total of the waste stream volumes generated from this removal response:

Non-Hazardous Waste Streams

- Acidic Liquid; 1,011 pounds solidified off-site at Veolia Technical Solutions in Menomonee Falls, Wisconsin (VTS) and sent to a Subtitle D VTS Landfill for disposal.
- Caustic White Powder; 543 pounds sent to a Subtitle D VTS landfill for disposal.
- Emulsified Petroleum Oil; 1,376 pounds used as a fuel off-site (energy recovery) at VTS.
- Solid Waste, including wooden pallets; 10.59 tons disposed off-site at the Emerald Park Landfill in Muskego, Wisconsin.

- Metal Fines; 7,200 pounds disposed off-site at VTS.

TSCA Waste Streams

- PCB/RACM: Including TSI ACM from the die cast area; 1,360 kilograms disposed off-site at the Environmental Quality landfill in Bellevue, Michigan (EQ).

- PCB Oily Water: Including water from the sumps and non-water soluble oils; 18,869 kilograms incinerated off-site at the VTS Port Arthur disposal facility in Texas (PA).

- PCB Impacted Debris: Trench sweepings, floor sweepings, white powder, tank bottom sludge, miscellaneous oil-covered debris intermingled with floor sweepings, and empty drum/container skins; 32,389 kilograms disposed off-site at EQ.

Hazardous Waste Streams

- Selenium Characteristic Water Soluble Oil (RCRA D010); 22,240 pounds incinerated off-site at the Lonestar Alternative Fuels disposal facility in Greencastle, Indiana.

- Caustic Liquid (RCRA D002); 44 pounds sent off-site for waste water treatment at VTS.

- Combustible Liquid (RCRA D001); 27 pounds used for energy recovery at VTS.

TSCA/Hazardous Waste Streams

- Caustic PCB Liquid (RCRA D002); 456 kilograms (1,005 pounds) incinerated off-site at PA.

- Caustic Combustible PCB Liquid (RCRA D001, D002); 84 kilograms (185 pounds) incinerated off-site at PA.

- Caustic Peroxide PCB Liquid (RCRA D001, D002); 20 kilograms (44 pounds) incinerated off-site at PA.

- Combustible PCB Solid (RCRA D001); 26 kilograms (57 pounds) incinerated off-site at PA.

- Combustible Sulfide PCB Liquid (RCRA D001, D003); 37 kilograms (82 pounds) incinerated off-site at PA.

Site Control Measures

The property boundary was surveyed on September 10, 2008. A copy of the property boundary survey is included in Appendix H. On September 11, 2008, an 8-foot high temporary security fence with three gates was installed along the Site property boundary. The gates were secured with a chain and lock. During the PCB source abatement and ACM removal actions, plywood was installed around the building exterior windows and the doors were secured with wood planks (if necessary). On December 3, 2008, plywood was secured over the tunnel manhole openings in the die cast area.

Summary

Between September 3, 2008 and December 16, 2008, ARCADIS completed a response action at the Site. The following is a summary of the work completed as part of the response action:

- The WDNR and U.S. EPA were consulted regarding the project schedule and informed with daily updates regarding the environmental response.

- A site-specific HASP was developed for the response actions. Tunnel openings, piping, and holes were marked and delineated using a combination of orange paint and caution tape. ARCADIS and Veolia personnel completed a daily tailgate health and safety briefing prior to conducting onsite activities.

- The door and metal fenced wall opening for the boiler room was secured with plywood boarding and plastic, respectively. Asbestos hazard signs were placed on the boarded door and plastic covered wall opening.

- Approximately 460 linear feet of TSI ACM was removed from piping runs in the die cast area. Following removal of the TSI ACM, the three debris piles were collected

and the floors beneath the piping runs were swept to remove any ACM that would have fallen from the piping runs. The ACM removed from the die casting area was sent off-site for disposal as a TSCA waste.

- Approximately 1,525 linear feet of TSI ACM and 72 fittings were removed from piping runs in the trimming department. The resulting 4.49 tons of ACM was sent off-site for disposal as a non-hazardous special waste.

- Pre-abatement, post-abatement, and continuous air monitoring samples were collected during the asbestos abatement activities and submitted for laboratory analysis of asbestos. The laboratory analytical results indicated that the asbestos air concentrations did not exceed applicable regulatory criteria.

- PCB oily water was removed from the north and south sumps on two occasions during this environmental response. Following the second removal of oily water, the sump inlets and outfalls were sealed by a licensed plumber and the sumps were triple rinsed/cleaned with a hot water pressure washer.

- Main tunnel network was physically mapped and two tunnel floor drains were identified and plugged with hydraulic water stop cement.

- Within 3 weeks of the sealing and plugging of the sumps and tunnel floor drains, groundwater and surface water recharged into the sumps and main tunnel network, reaching an average static level of 4 feet below the surface grade. The recharged water from each sump and the main tunnel system was sampled for VOCs and PCBs. The PCB concentrations were acceptable for wastewater disposal via a closed system non-contact application and were below the decontamination standard for liquid waste of 2.0 ppm.

- The concrete floors, trenches, northwestern sump, and western and middle access tunnels were swept and/or pressure washer with water; removing the PCB impacted debris and/or oily water/sludge.

- All waste (with exception to the RACM in the trimming department) at the Site was characterized in accordance with CFR Title 40, Subpart D, § 761.62(a) and Veolia's *Unknown Characterization Procedures, Suspect Chemical Non-Biological,* dated March 2007. The field and laboratory waste characterization results

identified five non-hazardous, three TSCA, three hazardous, and five TSCA/hazardous waste streams at the Site. Profiles generated for the waste streams were signed by the Site owner and approved by waste disposal facility.

- The 16 waste streams were prepared for transportation in accordance with the DOT HMR in 49 CFR parts 171 through 180. All waste streams were sent off-site under a waste shipping manifest completed in accordance with U.S. EPA and DOT regulations and signed by the generator, transporter, and designated facility. All shipping containers and waste transportation and tanker trucks were labeled in accordance with 49 CFR 172.101.

- A total of 15.7 tons non-hazardous waste was sent off-site for disposal. Approximately 10.59 tons consisted of wooden pallets disposed at the Emerald Park Landfill in Muskego, Wisconsin. The remaining waste included acidic liquid, caustic white powder, emulsified petroleum oil, and metal fines disposed at the Veolia Technical Solutions disposal facility in Menomonee Falls, Wisconsin.

- A total of 71,027 kilograms of TSCA regulated waste was sent off-site for disposal. The TSCA waste included PCB/RACM and PCB impacted debris disposed at the Environmental Quality landfill in Bellevue, Michigan and PCB oily water incinerated at the Clean Harbors Deer Park and VTS Port Arthur disposal facilities in Texas.

- A total of 23,685 pounds of RCRA hazardous and TSCA/RCRA hazardous waste were sent off-site for disposal. The RCRA hazardous waste included selenium characteristic water soluble oil, caustic liquid, and combustible liquid. The TSCA/RCRA hazardous waste included caustic PCB liquid, caustic combustible PCB liquid, caustic peroxide PCB liquid, combustible PCB solids, and combustible sulfide PCB liquid. The selenium characteristic water soluble oil was disposed at the Lonestar Alternative Fuels disposal facility in Greencastle, Indiana. The remaining wastes were disposed at the Veolia Technical Solutions disposal facilities in Menomonee Falls, Wisconsin or Port Arthur, Texas.

- An 8-foot high temporary security fence with three gates was installed along the property boundary to secure the Site. The gates were secured with a chain and lock. Plywood was installed around the building exterior windows and over the tunnel manhole openings and the doors were secured with wood planks (as necessary).

- Following completion of the removal action activities, the water service to the Site was disconnected on November 25, 2008. On September 11, 2008, all power to the Site was disconnected.

References

ARCADIS, 1998. Soil and Groundwater Quality Investigation, Milwaukee Die Casting Facility, Milwaukee, Wisconsin. July 1998

Milwaukee Metropolitan Sewage District, 2008. Notice of Prohibited Polychlorinated Biphenyls Discharge, Order to Immediately Disconnect Plumbing and Bulkhead Connections to the Sewerage System from the Slyman Property. July 11, 2008.

United States Geological Survey. 1958, photorevised 1971. Milwaukee Quadrangle Wisconsin map. 7.5 Minute Series: 1:24,000.

Wisconsin Department of Natural Resources, 2002. Wisconsin Administrative Code Chapters NR 700 through 749.

Wisconsin Department of Natural Resources, 2008. Immediate and Remedial Environmental Response Actions Required for Property at 4132 N. Holton Street. August 19, 2008.

TABLES

ARCADIS

Table 1. Summary of Manholes, Sumps, and Tunnel Drains, Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

Identification	Acronmyn	Approximate Location	Dimensions		Lateral Location on Interior Face (depth from top of manhole rim)			
Exterior Sanitary Sewer Manholes			*Diameter*	*Depth*	*North*	*South*	*East*	*West*
North Sewer Sump	NSS	40 ft north, 5 ft east of northeastern building corner	42	155	132*	--	--	107*
South Sewer Sump	SSS	75 ft south, 5 ft east of northeastern building corner	42	165	--	138*	165*	--
Interior Sanitary Sewer Manholes								
Sanitary Sewer #2, Manhole #1	SANMH1	45 ft north, 35 ft west of southeastern building corner	--	--	NA, plugged with debris			
Sanitary Sewer #2, Manhole #2	SANMH2	140 ft west of SANMH1	42	60	--	--	55	55
Sanitary Sewer #2, Manhole #3	SANMH3	80 ft west of SANMH2	42	60	--	--	55	55
Exterior Storm Sewer Manholes								
Storm Sewer #1, Manhole #1	STMH1	45 ft north, 5 ft east of northeastern building corner	42	72	--	--	70	70
Storm Sewer #1, Manhole #2	STMH2	100 ft west/southwest of STMH1	42	72	--	--	70	70
Storm Sewer #1, Manhole #4	STMH4	40 ft south, 15 ft west of northwestern building corner	--	--	NA, plugged with debris			
Storm Sewer #2, Manhole #7	STMH7	Adjacent to southern building wall, center of loading dock	--	--	NA, plugged with debris			
Storm Sewer #2, Manhole #8	STMH8	60 ft southwest of STMH7	--	--	NA, plugged with debris			
Interior Storm Sewer Manholes								
Storm Sewer #1, Manhole #3	STMH3	5 ft south, 55 ft east of northwestern building corner	--	--	NA, plugged with debris			
Storm Sewer #2, Manhole #5	STMH5	40 ft north, 80 ft west of southeastern building corner	--	--	NA, plugged with debris			
Storm Sewer #1, Manhole #6	STMH6	110 ft west/southwest of STMH5	42	88	--	--	84	48
Interior Sumps								
Interior Sump #1	IS1	20 ft south, 20 ft west of northeastern building corner	--	--	NA, plugged with debris			
Interior Sump #2	IS2	115 ft west of IS1	42	48	--	--	46	--
Interior Sump #3	IS3	15 ft by 15 ft vault, main tunnel system	24	24	--	--	--	--
Interior Sump #4	IS4	Southwestern corner of main tunnel system	24	24	--	--	--	--
Interior Sump #5	IS5	Southern floor drain system	--	--	NA, plugged with concrete			
Tunnel Drains								
Tunnel Drain #1	TD1	Convergence of south main tunnel with east main tunnel	4	6	--	--	6**	--
Tunnel Drain #2	TD2	15 ft by 15 ft vault, main tunnel system	4	6	--	--	6**	--

Note: Unless otherwise noted, all measurements are approximate and reported in inches.

* Laterals were plugged on September 10, 2008.

** Drains and laterals were plugged on September 12, 2008.

ft Feet.

NA Not accessible.

ARCADIS

Table 2. Sump and Tunnel Water VOC and PCB Analytical Results, Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

Location			North Sump	South Sump	Main Tunnel
Sample ID	NR 140	NR 140	NS-WS	SS-WS	MT-WS
Sample Date	ES	PAL	11/12/08	11/12/08	11/12/08
VOCs (µg/L)					
Chloroform	6	0.6	<0.20	<0.20	0.41 J
1,1-Dichloroethane	850	85	<0.50	14	<0.50
cis-1,2-Dichloroethene	70	7	**150**	**260**	6.9
trans-1,2-Dichloroethene	100	20	2.1	2.3 J	<0.20
Tetrachloroethene	5	0.5	**13**	2.9 J	0.79 J
Trichloroethene	5	0.5	**15**	**12**	**7.2**
Vinyl Chloride	0.2	0.02	**2**	**4.6**	**0.42 J**
PCBs (µg/L)			**11/19/08**	**11/19/08**	**11/19/08**
PCB-1016	--	--	<0.67	<3.6	<1.5
PCB-1221	--	--	<1.8	<9.9	<4.0
PCB-1232	--	--	<0.70	<3.8	<1.5
PCB-1242	--	--	3.8 J	70	13 J
PCB-1248	--	--	<0.67	<3.6	<1.5
PCB-1254	--	--	<0.81	<4.4	<1.8
PCB-1260	--	--	<0.75	<4.1	<1.6
Total Detected PCBs	0.03	0.003	**3.8**	**70**	**13**
Total PCBs	--	--	9.2	99.4	24.9

Only detected VOCs are summarized in this table, for a complete listing please refer to the laboratory report.

[ ]	Concentration exceeds the WDNR NR 140 Preventive Action Limit (PAL).
--	Not established.
Bold	Concentration exceeds the WDNR NR 140 Enforcement Standard (ES).
ES	Enforcement standard.
J	Results reported between the method detection limit and limit of quantitation.
µg/L	Micrograms per liter.
PAL	Preventive action limit.
PCBs	Polychlorinated biphenyls.
VOCs	Volatile organic compounds.

ARCADIS

Table 3. Inventory and Field Characterization Results of Waste Streams, Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

ID	Vessel Type	Volume	Media	Observed Markings	Amount	Field Characterization									Field Description, RCRA Characteristic or Listed Hazardous Waste Code(s) (Waste Stream Number)
						Acidic	*Caustic*	*Water Soluble*	*Combustible*	*Alcohol/ Aldehyde*	*Flammable*	*Sulfide*	*Peroxide*	*PCBs*	
Non-Hazardous Waste Streams															
21	PL, CT Drum	55 gal	L	MFS-60ZL	1/4 full	X								NS/Lab	Acidic Liquid (1)
25	PL, CT Drum	55 gal	L	None	Full	X								NS/Lab	
C29	PL, Container	5 gal	L	Oakite 33 Corrosive	Full	X								NS/MSDS	
C42	PL, Container	5 gal	L	Multitherm PG-1 Heat Transfer	Full	X								NS/MSDS	
19	ML, OT Drum	55 gal	S	None	3/4 full		X	X						NS/Lab	Caustic White powder (2)
C40	PL, Container	5 gal	S	RX Refractory Coating	Full		X							NS/Lab	
46	ML, CT Drum	55 gal	L	Die Slick Oil 914	Full										
47	ML, CT Drum	55 gal	L	Die Slick Oil 914	Full	NS/MSDS	NS/MSDS	NS/MSDS	NS/MSDS	NS/MSDS	NS/MSDS	NS/MSDS	NS/MSDS	NS/MSDS	Emulsified petroleum oil (3)
49	ML, CT Drum	55 gal	L	Die Slick Oil 914	Full										
	Wooden Pallets	60 CY	S	None	650 units	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	Solid Waste (4)
13	PL, OT Drum	55 gal	S	None	Full										
18	ML, OT Drum	55 gal	S	None	3/4 full										
57	ML, OT Drum	55 gal	S	None	Full										
62	ML, OT Drum	55 gal	S	None	1/2 full										
63	ML, OT Drum	30 gal	S	None	3/4 full	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	Metal Fines (5)
9	F, OT Drum	55 gal	S	None	1/2 full										
26	ML, OT Drum	55 gal	S	None	Full										
33	ML, OT Drum	55 gal	S	None	Full										
66	ML, OT Drum	55 gal	S	None	Full										
TSCA/RACM Waste															
86	CY Boxes/ RACM	6 CY	S	None	Full	NS	NS	NS	NS	NS	NS	NS	NS	NS	PCB/ACM Waste (6)
TSCA Waste Streams															
6	PL, CT Drum	55 gal	L	None	Full									X	PCB Oily Water (7)
34	ML, CT Drum	55 gal	L	None	Full									X	
43	ML, CT Drum	55 gal	L	None	1/4 full									X	
52	ML, OT Drum	55 gal	L	None	1/2 full									X	
69	PL, CT Drum	55 gal	L	None	3/4 full									X	
70	PL, CT Drum	30 gal	L	KML BWT-207	1/2 full									X	
77	Access Tunnels	3,000 gal	L/SL	None	NA				X	X	X			X	
78	North Sump	700 gal	L	None	Full	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	
79	South Sump	700 gal	L	None	Full	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	
80	Northwestern Sump	700 gal	L	None	Full	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	
81	Main Tunnel	90,000 gal	L	None	Full	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	
82	Totes/Cleaning of Floors	1,100 gal	L	None	Full	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	NS/Lab	
C1	OT, Spill Box	40 gal	L/SL	None	1/2 full									X	
C2	PL, OT Container	6 gal	L/SL	None	Full									X	
C3	PL, Container	5 gal	L/SL	None	Full									X	
C4	PL, Container	5 gal	L/SL	None	Full									X	
C5	PL, OT Drum	15 gal	L/SL	None	Full									X	

Footnotes on Page 4.

ARCADIS

Table 3. Inventory and Field Characterization Results of Waste Streams, Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

ID	Vessel Type	Volume	Media	Observed Markings	Amount	Field Characterization									Field Description, RCRA Characteristic or Listed Hazardous Waste Code(s) (Waste Stream Number)
						Acidic	*Caustic*	*Water Soluble*	*Combustible*	*Alcohol/ Aldehyde*	*Flammable*	*Sulfide*	*Peroxide*	*PCBs*	
TSCA Waste Streams (continued)															
C6	ML, OT Kettle	10 gal	L	None	1/2 full									X	
C7	PL, Container	5 gal	L	900Z-15 Release Agent	1/2 full			X						X	
C9	PL, Container	5 gal	L	None	Full									X	
C10	PL, Container	5 gal	L	Benzoil, ATP (Ford)	Full									X	
C11	PL, Container	5 gal	L	Benzoil, Lube	Full									X	
C13	PL, Container	5 gal	L	Metal Working Fluid	Full			X						X	
C22	PL, Container	5 gal	L	Standard Oil Fiber Stick	Full									X	
C24	PL, Container	5 gal	L	Abrasive Systems Inc.	Full									X	
C28	PL, Container	5 gal	L	Heat Transfer Fluid 500	Full									X	
C30	PL, Container	5 gal	L	Benzoil	Full									X	
C31	PL, Container	5 gal	L	Aluminum Release Agent	Full									X	
C32	PL, Container	5 gal	L	Sealed Pail	Full									X	
C33	PL, Container	5 gal	L	EDM Fluid - Oil	Full									X	PCB Oily Water (7) (continued)
C34	PL, Container	5 gal	L	Benzoil	Full									X	
C35	PL, Container	5 gal	L	Lube 9200	Full									X	
C36	PL, Container	5 gal	L	Coolant	Full									X	
C37	PL, Container	5 gal	L	Benzoil Way Lube 220	Full									X	
C38	PL, Container	5 gal	L	Sullube 32	Full									X	
C39	PL, Container	5 gal	L	L/O TCFGUN 5	Full									X	
C41	PL, Container	5 gal	L	EDM Fluid	Full									X	
C44	PL, Container	5 gal	L	None	Full		X							X	
C45	PL, Container	5 gal	L	Aluminum Release Agent	Full									X	
C46	PL, Container	5 gal	L	Benzoil Retaulic 32	Full									X	
C47	PL, Container	5 gal	L	None	Full									X	
C48	PL, Container	5 gal	L	Pittsburg	Full									X	
5	ML, OT Drum	55 gal	S/SL	None	Full									X	
7	ML, CT Drum	55 gal	S/SL	Waylube 220	1/2 full									X	
10	ML, OT Drum	55 gal	S	None	1/2 full									X	
14	F, OT Drum	55 gal	S	None	Full									X	
15	ML, OT Drum	55 gal	S	None	1/2 full									X	
16	F, OT Drum	55 gal	S	None	1/2 full									X	
17	F, OT Drum	55 gal	S	None	1/2 full									X	PCB Impacted Debris (8) (Includes trench sweepings, floor sweepings, white powder, tank bottom sludge, oil covered debris and RACM, empty drum/container skins)
20	ML, OT Drum	55 gal	S	None	Full									X	
23	ML, OT Drum	55 gal	S	None	Full									X	
31	ML, OT Drum	55 gal	S	None	Full									X	
32	ML, OT Drum	55 gal	S	None	Full									X	
42	ML, CT Drum	55 gal	S/SL	None	1/2 Full									X	
45	ML, OT Drum	55 gal	S	None	Full									X	
50	ML, CT Drum	55 gal	S	None	Full									X	
51	ML, OT Drum	55 gal	S	None	1/2 full									X	

Footnotes on Page 4.

ARCADIS

Table 3. Inventory and Field Characterization Results of Waste Streams, Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

ID	Vessel Type	Volume	Media	Observed Markings	Amount	Field Characterization									Field Description, RCRA Characteristic or Listed Hazardous Waste Code(s) (Waste Stream Number)
						Acidic	*Caustic*	*Water Soluble*	*Combustible*	*Alcohol/ Aldehyde*	*Flammable*	*Sulfide*	*Peroxide*	*PCBs*	
TSCA Waste Streams (continued)															
53	ML, OT Drum	55 gal	S/SL	None	Full									X	PCB Impacted Debris (8) (continued) (Includes trench sweepings, floor sweepings, white powder, tank bottom sludge, oil covered debris and RACM, empty drum/container skins)
56	ML, OT Drum	55 gal	S	None	Full									X	
58	ML, OT Drum	55 gal	S	None	Full									X	
68	ML, OT Drum	55 gal	S	None	Full									X	
71	F, OT Drum	55 gal	S	None	1/2 full									X	
73	ML, OT Drum	55 gal	S	None	1/2 full									X	
74	ML, OT Drum	55 gal	S	None	1/2 full									X	
75	CY Boxes/Trench and Floor Sweepings	6 CY	S	None	Full									X	
83	PL AST	1,500 gal	S/SL	None	Bottoms	NS	NS	NS	NS	NS	NS	NS	NS	NS	
84	PL AST	1,500 gal	S/SL	None	Bottoms	NS	NS	NS	NS	NS	NS	NS	NS	NS	
85	CY Boxes/ Miscellaneous Debris	4 CY	S	None	Full	NS	NS	NS	NS	NS	NS	NS	NS	NS	
C25	PL, Container	5 gal	S	Tracote #95	Full									NS	
C27	PL, Container	5 gal	S	mortar	1/2 Full									NS	
C43	PL, Container	5 gal	S	PolySlick No DO-5	Full									NS	
Hazardous Waste															
1	ML, CT Drum	55 gal	L	None	Full	X									Water Soluble Oil, D010 (9)
2	PL, CT Drum	55 gal	L	BC-1339	10 gal	X									
4	PL, CT Drum	55 gal	L	Howell MFR	1/2 full	X									
8	ML, CT Drum	55 gal	L	Howell MFR	1/8 full	X									
22	PL, CT Drum	30 gal	L	KMI Water Treatment	1/2 full	X									
27	PL, CT Drum	55 gal	L	None	Full	X									
28	ML, CT Drum	55 gal	L	None	Full	X									
29	ML, CT Drum	55 gal	L	Benzoil	Full	X									
30	ML, CT Drum	55 gal	L	None	Full	X									
35	ML, CT Drum	55 gal	L	None	Full	X									
36	ML, CT Drum	55 gal	L	None	Full	X									
37	ML, OT Drum	55 gal	L	Trim Line ID3-LO	1/2 full	X									
38	ML, CT Drum	55 gal	L	Multitron PG-1	Full	X									
39	ML, CT Drum	55 gal	L	None	Full	X									
40	ML, CT Drum	55 gal	L	None	Full	X									
41	ML, CT Drum	55 gal	L	None	1/8 full	X									
44	ML, CT Drum	55 gal	L	None	Full	X									
48	ML, CT Drum	55 gal	L	None	Full	X									
54	PL, OT Drum	55 gal	L	None	Full	X									
55	ML, CT Drum	55 gal	L	Cen-Pe-Co	Full	X									
59	ML, CT Drum	55 gal	L	None	Full	X									
60	ML, CT Drum	55 gal	L	None	Full	X									
61	ML, CT Drum	55 gal	L	None	Full	X									
64	ML, CT Drum	55 gal	L	None	Full	X									

Footnotes on Page 4.

ARCADIS

Table 3. Inventory and Field Characterization Results of Waste Streams, Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

ID	Vessel Type	Volume	Media	Observed Markings	Amount	Field Characterization									Field Description, RCRA Characteristic or Listed Hazardous Waste Code(s) (Waste Stream Number)
						Acidic	*Caustic*	*Water Soluble*	*Combustible*	*Alcohol/ Aldehyde*	*Flammable*	*Sulfide*	*Peroxide*	*PCBs*	
Hazardous Waste (continued)															
65	ML, CT Drum	55 gal	L	None	Full			X							Water Soluble Oil, D010 (9) (continued)
67	ML, CT Drum	55 gal	L	None	Full			X							
76	PL AST	1,500 gal	L	None	Full			X							
C17	PL, Container	5 gal	L	Oakite Enprox 714 Corrosive	Full		X							NS/MSDS	Caustic Liquid, D002 (10)
C18	PL, Container	5 gal	L	Protecto Kote Benzoil 45 Flammable	Full				X					NS/MSDS	Combustible Liquid, D001 (11)
TSCA/Hazardous Waste															
3	F, CT Drum	30 gal	L	Corrosive Liquid	Full		X							NS	Caustic PCB Liquid, D002 (12)
11	F, CT Drum	30 gal	L	Metsil, 1296	Full		X	X						NS/MSDS	
C8	PL, Container	5 gal	L	None	Full		X							NS	
C12	PL, Container	5 gal	L	1250 Snappy Degreaser	Full		X	X						NS	
C15	PL, Container	5 gal	L	Tech Cleaner 7022	Full		X	X						NS	
C26	PL, Container	5 gal	L	Process 227 Cleaner	Full		X							NS/MSDS	
C14	PL, Container	5 gal	L	Heavy Duty Coating Flammable	Full		X		X					NS	Caustic Combustible PCB Liquid, D001, D002 (13)
C20	PL, Container	5 gal	L	Gloss Polyamide Epoxy Flammable	Full		X		X					NS	
C49	PL, Container	5 gal	L	Flammable	Full		X		X					NS	
C19	PL, Container	5 gal	L	Grade E 1626	Full		X						X	NS	Caustic Peroxide PCB Liquid, D001, D002 (14)
C16	PL, Container	5 gal	S	Flammable	1/2 full				X					NS	Combustible PCB Solid, D001 (15)
C23	PL, Container	5 gal	L	Gloss Polyamide Epoxy Flammable	Full				X			X		NS	Combustible Sulfide PCB Liquid, D001, D003 (16)
C21	PL, Container	5 gal	SL	Waste Oil	Full				X			X		NS	
Empty Containers															
12	PL, CT Drum	30 gal	NA	OS-2140	Empty	NA	NA	NA	NA	NA	NA	NA	NA	NA	Empty
24	ML, OT Drum	55 gal	NA	None	Empty										
72	ML, CT Drum	55 gal	NA	Safety Lube 8515	Empty										
87	ML, Tote	250 gal	NA	Benzoil	Empty										
88	ML, Tote	250 gal	NA	Benzoil	Empty										

AST Aboveground storage tanks.
cy Cubic yard.
CT Closed top.
F Fiber.
gal Gallon.
ID Characterization identification number.
L Liquid media.
ML Metal.
NS Not sampled. All material not sampled for PCBs was assumed to be a TSCA waste, unless characterized below.
NS/Lab Not sampled. Characterized according to laboratory analytical results.
NS/MSDS Not sampled. TSCA determination from information on Material Safety Data Sheet.
NA Not applicable.
OT Open top.
PL Plastic.
RACM Regulated asbestos containing material.
S Solid media.
SL Sludge media.
TSCA Toxic Substances Control Act of 1977

RCRA Characteristic or Listed Hazardous Waste Codes:
D001 Ignitable liquid waste with a flash point less than 140°.
D002 Corrosive aqueous waste with a pH less than or equal to 2.0 or greater than or equal to 12.5.
D003 Reactive sulfide waste which forms toxic gases at a pH between 2 and 12.5.
D010 Selenium toxic liquid waste.

Table 4. Waste Stream Laboratory Analytical Results, Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

Waste Stream		(1) Acidic Liquid[1]	(2) Caustic White Powder	(4) Solid Waste	(5) Metal Fines	(7) PCB Oily Water[2]		(8) PCB Waste[2]		(9) Water Soluble Oil[3]
Waste Stream Sample Description	RCRA Characteristic Hazardous Waste Threshold Limits	Composite of liquid in two drums.	Soil, white powder in one drum.	Stained pallets.	Metal fine from eight drums.	Composite of liquid in access tunnels.	Composite of non-water soluble oil in five drums.	Composite of floor sweepings from floors and trenches.	Composite of floor sweepings collected from drums.	Composite of oil in one plastic AST and 25 drums.
Sample Identification		#6 Acid	Misc. Solids #19	Wood Shavings (Pallets)	DR8-MS-WS	#5 Flammable	#8 Oil	Misc. Solids #3	Misc. Solids #1	#7 Water Soluble Oil
General Chemistry Parameters										
% Solids	--	10	73	NS	96	0.99	2.8	87	94	18
Cyanide, total (mg/kg)	590	<0.50	<0.50	NS	<0.50	<0.50	<0.50	<0.50	<0.50	1.5
Flashpoint (°F)	<140	>200	>200	NS	>200	>200	>200	>200	>200	>200
pH (pH Units)	pH≤2.5 or pH ≥12.5	4.00	9.65	NS	6.42	7.00	7.00	6.52	6.29	10.0
Sulfide (mg/kg)	500	<10	<10	NS	21	20	<10	12	20	12
Chlorine (%)	10	0.036	0.065	NS	0.16	0.059	0.033	0.29	0.087	0.021
Paint Filter Liquids (mL)	*	97	<0.10	NS	<0.10	66	100	<0.10	<0.10	94
Specific Gravity	--	0.97	1.4	NS	1.5	0.90	0.86	1.4	1.4	0.93
TCLP Metals (mg/L)										
Arsenic	5.0	<0.90	<0.90	NS	<0.3	<0.36	<0.36	<0.36	<0.36	<0.90
Barium	100	0.074	<0.050	NS	<0.1	0.050	0.054	0.48	0.31	0.17
Cadmium	1.0	<0.050	<0.050	NS	0.0925	<0.020	0.042	0.070	0.037	<0.050
Chromium	5.0	<0.10	<0.10	NS	<0.020	<0.040	<0.040	<0.040	0.79	<0.10
Copper	100	<0.25	<0.25	NS	0.94	<0.10	0.24	3.0	1.0	1.3
Lead	5.0	<0.50	<0.50	NS	<0.1	<0.20	<0.20	<0.20	<0.20	<0.50
Mercury	0.2	<0.0090	<0.0010	NS	<0.0020	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
Nickel	--	<0.10	<0.10	NS	<0.050	<0.040	0.072	0.11	0.28	<0.10
Selenium	1.0	<0.80	<0.80	NS	<0.15	<0.32	<0.32	<0.32	<0.32	1.4
Silver	5.0	<0.10	<0.10	NS	<0.020	<0.040	<0.040	<0.040	<0.040	<0.10
Zinc	500	1.1	1.3	NS	27.8	0.15	9.0	170	58	10
TCLP VOCs (mg/L)										
Benzene	0.5	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
2-Butanone (MEK)	200	<3.2 RL8	<0.20	NS	<0.20	<0.80	<8.0 RL8	<0.20	<0.20	<8.0 RL8
Carbon Tetrachloride	0.5	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
Chlorobenzene	100	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
Chloroform	6.0	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
1,2-Dichloroethane	0.5	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
1,1-Dichloroethene	0.7	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
Tetrachloroethene	0.7	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
Trichloroethene	0.5	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
Vinyl chloride	0.2	<3.2 RL8	<0.020	NS	<0.020	<0.080	<0.80 RL8	<0.020	<0.020	<0.80 RL8
TCLP SVOCs (mg/L)										
1,4-Dichlorobenzene	7.5	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
2,4-Dinitrotoluene	0.13	<0.600 RL1	<0.0600	NS	<0.0600	<0.600 RL1	<0.600 RL1	<0.600 RL1	<0.600 RL1	<3.00 RL1
Hexachlorobenzene	0.13	<0.600 RL1	<0.0600	NS	<0.0600	<0.600 RL1	<0.600 RL1	<0.600 RL1	<0.600 RL1	<3.00 RL1
Hexachloroethane	3.0	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1

Footnotes on Page 3.

Table 4. Waste Stream Laboratory Analytical Results, Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

Waste Stream		(1) Acidic Liquid[1]	(2) Caustic White Powder	(4) Solid Waste	(5) Metal Fines	(7) PCB Oily Water[2]		(8) PCB Waste[2]		(9) Water Soluble Oil[3]
Waste Stream Sample Description	RCRA Characteristic Hazardous Waste Threshold Limits	Composite of liquid in two drums.	Soil, white powder in one drum.	Stained pallets.	Metal fine from eight drums.	Composite of liquid in access tunnels.	Composite of non-water soluble oil in five drums.	Composite of floor sweepings from floors and trenches.	Composite of floor sweepings collected from drums.	Composite of oil in one plastic AST and 25 drums.
Sample Identification		#6 Acid	Misc. Solids #19	Wood Shavings (Pallets)	DR8-MS-WS	#5 Flammable	#8 Oil	Misc. Solids #3	Misc. Solids #1	#7 Water Soluble Oil
TCLP SVOCs (mg/L) (continued)										
Hexachlorobutadiene	0.5	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
Nitrobenzene	2.0	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
Pyridine	5.0	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
Cresol(s)	200	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
2-Methylphenol (o-Cresol)	200	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
4-Methylphenol (p-Cresol)	200	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
Pentachlorophenol	100	<3.50 RL1	<0.350	NS	<0.350	<3.50 RL1	<3.50 RL1	<3.50 RL1	<3.50 RL1	<17.5 RL1
Phenol	--	<0.700 RL1	<0.0700	NS	<0.0700	5.54 RL1	<0.700 RL1	1.47 RL1	<0.700 RL1	<3.50 RL1
2,4,5-Trichlorophenol	400	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
2,4,6-Trichlorophenol	2.0	<0.700 RL1	<0.0700	NS	<0.0700	<0.700 RL1	<0.700 RL1	<0.700 RL1	<0.700 RL1	<3.50 RL1
PCBs (mg/kg)	**TSCA Waste Threshold Limits**									
PCB-1016	--	<0.800	0.05	<0.292	<2.6	<0.699	<0.441	<0.0500	<0.0500	<0.800
PCB-1221	--	<0.800	0.05	<0.292	<2.6	<0.699	<0.441	<0.0500	<0.0500	<0.800
PCB-1232	--	<0.800	0.05	<0.292	<2.6	<0.699	<0.441	<0.0500	<0.0500	<0.800
PCB-1242	--	<0.800	1.26	29.6	9.0	4770	101	370	9.8	1.92
PCB-1248	--	<0.800	0.05	<0.292	<2.6	<0.699	<0.441	<0.0500	<0.0500	<0.800
PCB-1254	--	<0.800	0.05	<0.292	<2.6	<0.699	<0.441	<0.0500	<0.0500	<0.800
PCB-1260	--	<0.800	0.05	<0.292	<2.6	<0.699	<0.441	<0.0500	<0.0500	<0.800
PCB-1268	--	<0.800	0.05	<0.292	<2.6	<0.699	<0.441	<0.0500	<0.0500	<0.800
Total PCBs	50	NA	1.61	31.6	27.2	**4774.9**	**104.09**	**370.4**	10.2	7.52

Footnotes on Page 3.

1 Due to waste matrix interference during the laboratory analyses, the acidic waste was solidification/landfill was the disposal option instead of waste water treatment.

2 Higher reporting limits from waste matrix interference during the laboratory analyses were considered in the incineration and landfilling disposal options for these PCB waste streams.

3 Higher reporting limits from waste matrix interference during the laboratory analyses were considered in the burning of this hazardous waste for energy recovery disposal option.

* Results exceeding detection limits are classified as a liquid/aqueous state, results below detection limits are classified as a solid state.

BOLD Sample concentration exceeds RCRA Characteristic Hazardous Waste Threshold Limits.

BOLD Sample concentration exceeds TSCA Waste Threshold Limits.

mg/kg Milligrams per kilogram.

mg/L Milligrams per liter.

MSDS Material safety data sheet.

NA Not applicable.

NR Not required by Veolia for waste disposal.

NS Not sampled.

PCB Polychlorinated biphenyls.

PPE Personnel protective equipment.

RACM Regulated asbestos containing material.

RCRA Resource Conservation and Recovery Act.

RL1 Reporting limit raised due to sample matrix effects.

RL8 Sample diluted due to foaming.

TSCA Toxic Substances Control Act of 1977.

TCLP Toxicity characteristic leachate procedure.

VOCs Volatile organic compounds.

SVOCs Semi-volatile organic compounds.

ARCADIS

Table 5. Summary of Waste Stream Volumes and Disposal Tracking Information[1], Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

Waste Stream	Number/Type of Shipping Container(s)	Identification	Estimated Volume/Weight	Manifest Number	Date Generated	Date Shipped	Date Received	Disposal Facility /Method	Actual Weight	Certificate of Destruction
Non-Hazardous Waste										
(1) Acidic Liquid	Two 85 gallon overpack drums	WY-1014314000-004	110 G	000155044 VES	10/27/2008	11/14/2008	11/19/2008	VTS/Solidification/Landfill	917 LBS	11/19/2008
(1) Acidic Liquid	Two 14 gallon overpack drums	WY-1014314000-005	94 LBS	000155044 VES	10/27/2008	11/14/2008	11/19/2008	VTS/Solidification/Landfill	94 LBS	11/19/2008
(2) Caustic white powder	One 85 gallon overpack drum	WY-1014314000-006	106 LBS	000155044 VES	10/27/2008	11/14/2008	11/19/2008	VTS/Landfill	106 LBS	11/19/2008
(2) Caustic white powder	One 14 gallon overpack drum	WY-1014314000-007	437 LBS	000155044 VES	10/27/2008	11/14/2008	11/19/2008	VTS/Landfill	437 LBS	11/19/2008
(3) Emulisified petroleum oil	Three 55-gallon metal drums	WY-1014314000-003	165 G	000155044 VES	10/27/2008	11/14/2008	11/19/2008	VTS/Energy Recovery	1,376 LBS	11/19/2008
(4) Solid waste (650 pallets)	Three 20-cubic yard roll-off boxes	Roll-Off Box #1	20 CY	ZZ00095127	10/9/2008	10/9/2008	10/9/2008	EPL/Landfill	3.53 T	10/9/2008
		Roll-Off Box #2	20 CY	ZZ00095128	10/13/2008	10/13/2008	10/13/2008	EPL/Landfill	3.53 T	10/13/2008
		Roll-Off Box #3	20 CY	ZZ00095129	10/14/2008	10/16/2008	10/16/2008	EPL/Landfill	3.53 T	10/16/2008
(5) Metal Fines	Nine 55-gallon metal drums	NA	7,200 LBS	ZZ00095130	10/8/2008	12/1/2008	12/4/2008	VTS/Landfill	7,200 LBS	12/4/2008
TSCA Waste										
(6) PCB ACM: TSI ACM (6 cubic yard boxes)	6 lined cubic yard boxes	Individual Boxes	1,360 K	000155041 VES	9/26/2008	12/1/2008	12/9/2008	EQ/Landfill	1,360 K	12/9/2008
(7) PCB Oily Water: Sumps and tunnels (4,400-gallons)	One tanker truck	Clean Harbors Tanker Truck #171	18,346.5 K	000676691	9/4/2008	9/4/2008	9/5/2008	DP/Incineration	18,409 K	9/5/2008
(7) PCB Oily Water: sumps, non-water soluble oil, floors, and trenches (3,750-gallons)	One tanker truck	Triad Tanker Truck #105	15,604 K	000155040 VES	10/27/2008	10/31/2008	11/3/2008	PA/Incineration	13,925 K	11/6/2008
(7) PCB Oily Water: Trenches (2,000-gallons)	One tanker truck	Triad Tanker Truck #103	8,350 K	000155243 VES	11/19/2008	12/1/2008	12/3/2008	PA/Incineration	4,944 K	12/6/2008
(8) PCB Waste: Trench sweepings, floor sweepings, white powder, tank bottom sludge, miscellaneous debris intermingled with floor sweepings, empty drum/container skins	Five 20-cubic yard roll-off boxes	Roll-Off Box #20-001	8,620 K	000155239 VES	9/30/2008	11/12/2008	11/13/2008	EQ/Landfill	9,480 K	11/13/2008
		Roll-Off Box #20-005	8,620 K	000155241 VES	10/14/2008	11/12/2008	11/13/2008	EQ/Landfill	9,480 K	11/13/2008
		Roll-Off Box #20-007	7,250 K	000155047 VES	10/16/2008	11/14/2008	11/17/2008	EQ/Landfill	3,245 K	11/20/2008
		Roll-Off Box #20-008	7,250 K	000155046 VES	10/28/2008	11/14/2008	11/17/2008	EQ/Landfill	3,245 K	11/20/2008
		Roll-Off Box #20-005	18,000 K	000155250 VES	12/15/2008	12/16/2008	12/19/2008	EQ/Landfill	6,939 K	12/19/2008
Hazardous Waste										
(9) Water Soluble Oil, D010 (2,700-gallons)	One tanker truck	Veolia Tanker Truck	2,700 G	000155244 VES	10/27/2008	12/15/2008	12/16/2008	LS/Energy Recovery	22,240 LBS	12/17/2008
(10) Caustic Liquid, D002	One 14 gallon overpack drum	WY-1014314000-001	44 LBS	000155044 VES	10/27/2008	11/14/2008	11/19/2008	VTS/Waste Water Treatment	44 LBS	11/19/2008
(11) Combustible Liquid, D001	One 14 gallon overpack drum	WY-1014314000-002	27 LBS	000155044 VES	10/27/2008	11/14/2008	11/19/2008	VTS/Energy Recovery	27 LBS	11/19/2008
TSCA\Hazardous Liquid Waste										
(12) Caustic PCB Liquid, D002	One 35 gallon overpack drum	WY-1014314001-007	198 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	198 K	1/6/2009
	One 35 gallon overpack drum	WY-1014314001-006	205 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	205 K	1/6/2009
	Four 14 gallon overpack drums	WY-1014314001-005	6 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	6 K	12/18/2008
			23 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	23 K	12/18/2008
			6 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	6 K	12/18/2008
			18 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	18 K	12/18/2008
(13) Caustic Combustible PCB Liquid, D001, D002	Three 14 gallon overpack drums	WY-1014314001-001	29 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	29 K	12/3/2008
			29 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	29 K	12/3/2008
			26 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	26 K	12/3/2008
(14) Caustic Peroxide PCB Liquid, D001, D002	One 14 gallon overpack drum	WY-1014314001-002	20 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	20 K	2/13/2009
(15) Combustible PCB Solid, D001	One 14 gallon overpack drum	WY-1014314001-003	26 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	26 K	12/3/2008
(16) Combustible Sulfide PCB Liquid, D001, D003	Two 14 gallon overpack drums	WY-1014314001-004	8 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	8 K	12/3/2008
			29 K	000155045 VES	10/27/2008	11/14/2008	11/24/2008	PA/Incineration	29 K	12/3/2008

Footnotes on Page 2.

ARCADIS

Table 5. Summary of Waste Stream Volumes and Disposal Tracking Information[1], Former Milwaukee Die Casting Company, Milwaukee, Wisconsin.

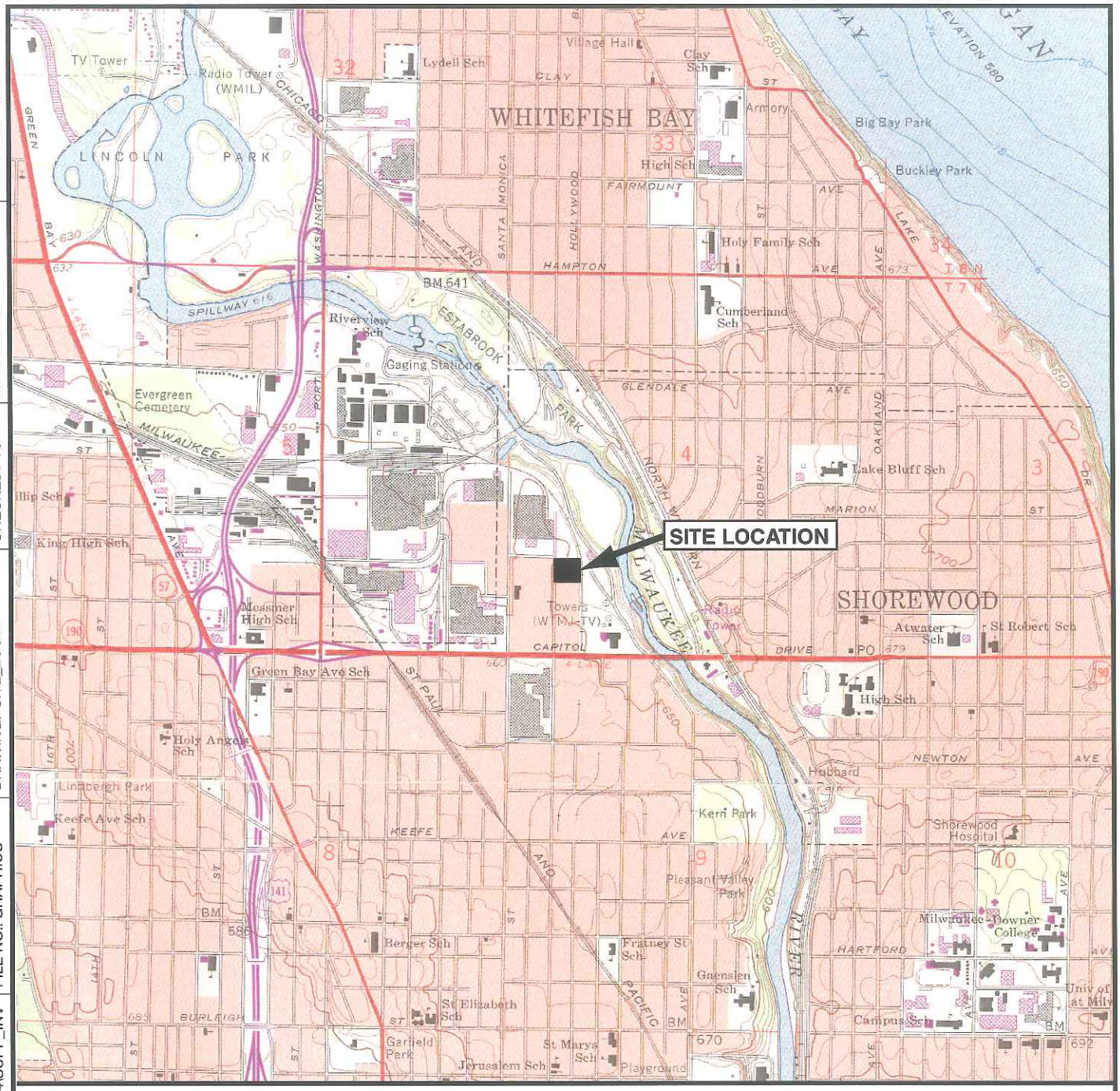
Waste Stream	Number/Type of Shipping Container(s)	Identification	Estimated Volume/Weight	Manifest Number	Date Generated	Date Shipped	Date Received	Disposal Facility /Method	Actual Weight	Certificate of Destruction
Regulated Abestos Containing Material (RACM)										
(17) Friable ACM (from trimming department)	One 40-cubic yard roll-off box	Roll-Off Box #4	19 CY	WSR GRL072220	10/8/2008	10/8/2008	10/8/2008	EPL/Landfill	4.49 T	10/8/2008

1 This information does not include work completed prior to September 2, 2008 under the directive of Environmental Audits.

ACM Asbestos containing material.
DP Clean Harbors Deer Park Disposal Facility, Texas
EQ Environmental Quality, Wayne Disposal Landfill, Michigan.
EPL Veolia Emerald Park Landfill, Wisconsin.
G Gallons.
GRL Veolia Glacier Ridge Landfill, Wisconsin.
K Kilograms.
LS Lonestar Disposal Facility, Greencastle, Indiana.
LBS Pounds.
NA Not applicable.
PA Veolia Port Arthur Disposal Facility, Texas.
T Tons.
VTS Veolia Technical Solutions, Menomonee Falls, Wisconsin.

FIGURES

DRAFTER: LMB | APPROVED: | CHECKED: TS | DRAWING: SITE_LOC.AI | FILE NO.: GRAPHICS | PN: MILDIECASTWI1094\SUPP_INV | DWG DATE: 19FEB09



SOURCE: USGS 7.5 Minute Topographic Map, MILWAUKEE, WISCONSIN Quadrangle, 1971

N

0 1000 2000 4000

SCALE IN FEET

WISCONSIN

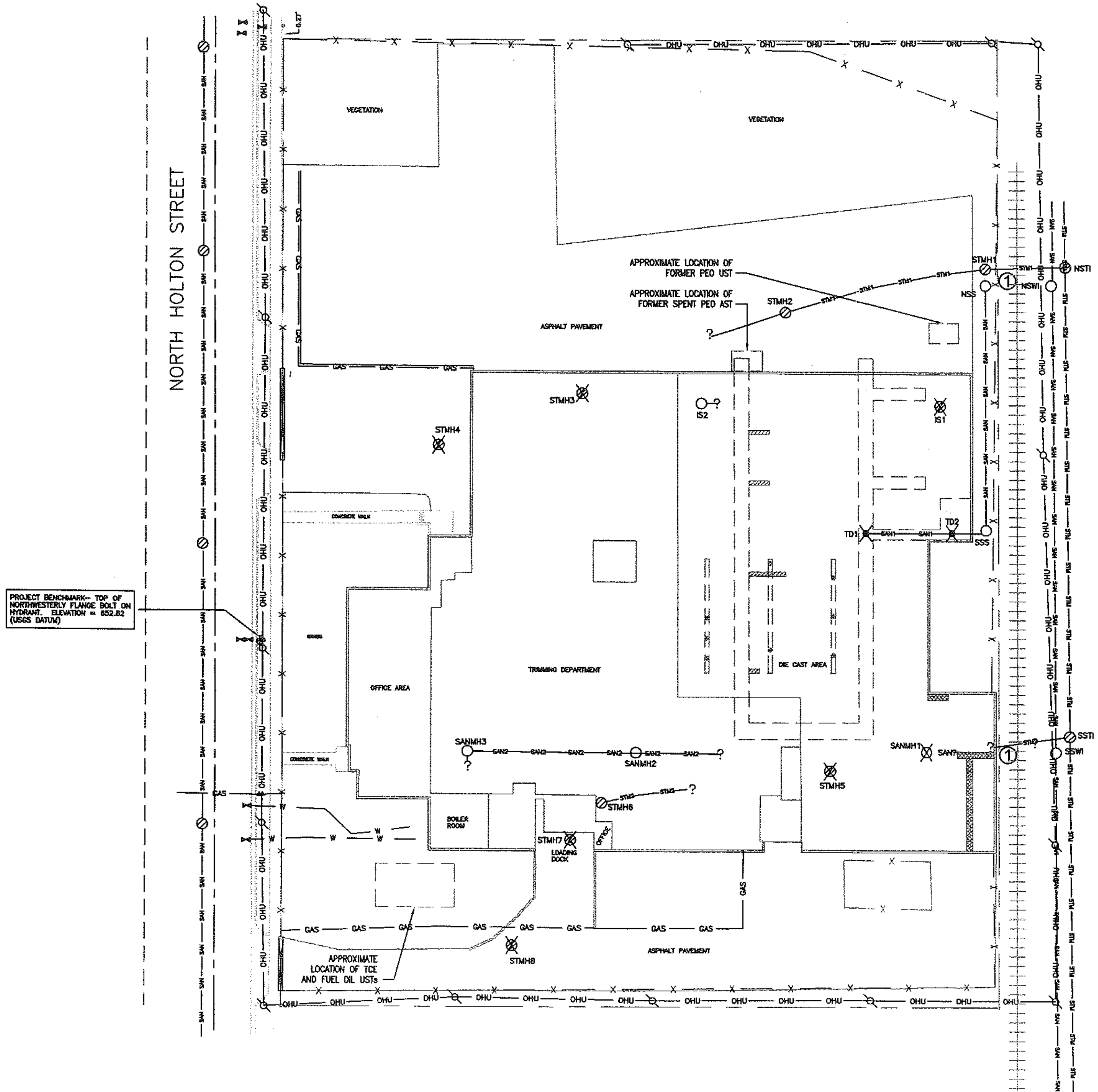
ARCADIS

SITE LOCATION MAP

FORMER MILWAUKEE DIE CASTING COMPANY
MILWAUKEE, WISCONSIN

FIGURE

1



LEGEND

(railroad symbol)	RAILROAD TRACK
SAN	SANITARY SEWER LINE
STM	STORM SEWER LINE
OHU	OVERHEAD UTILITY
GAS GAS	GAS LINE
W	WATER LINE
X	FENCE
(dashed line)	APPROXIMATE PROPERTY BOUNDARY
(tunnel symbol)	UTILITY TUNNEL
(symbol)	TUNNEL DRAIN – PLUGGED ON 9/12/08
⊘	STORM SEWER MANHOLE
(symbol)	STORM SEWER MANHOLE FILLED WITH DEBRIS
○	SANITARY SEWER MANHOLE
(symbol)	SANITARY SEWER MANHOLE FILLED WITH DEBRIS
①	SANITARY SEWER LINE REMOVED, LINE BULK HEADED BY MMSD IN AUGUST 2008.
STMH	STORM SEWER MANHOLE
STI	STORM SEWER INCEPTOR
SANMH	SANITARY SEWER MANHOLE
SWI	SANITARY SEWER INCEPTOR
SS	SANITARY SUMP
TD	TUNNEL DRAIN
TS	INTERIOR SUMP

NOTE: PROJECT SOURCES INCLUDE SOIL AND GROUNDWATER QUALITY INVESTIGATIONS REPORT COMPLETED BY ARCADIS, DATED JULY 1989.

0 30 60
SCALE IN FEET

Path\Name : G:\project\MILDIECAS\WI1196\PCBACM_ABATE\cadd\SITE BASE-12-23-08 tas.dwg

Page Setup: ----
Pen Table: ----

REV. ISSUED DATE DESCRIPTION

KEYPLAN

SEAL

ARCADIS

FORMER MILWAUKEE DIE CASTING COMPANY
MILWAUKEE, WISCONSIN

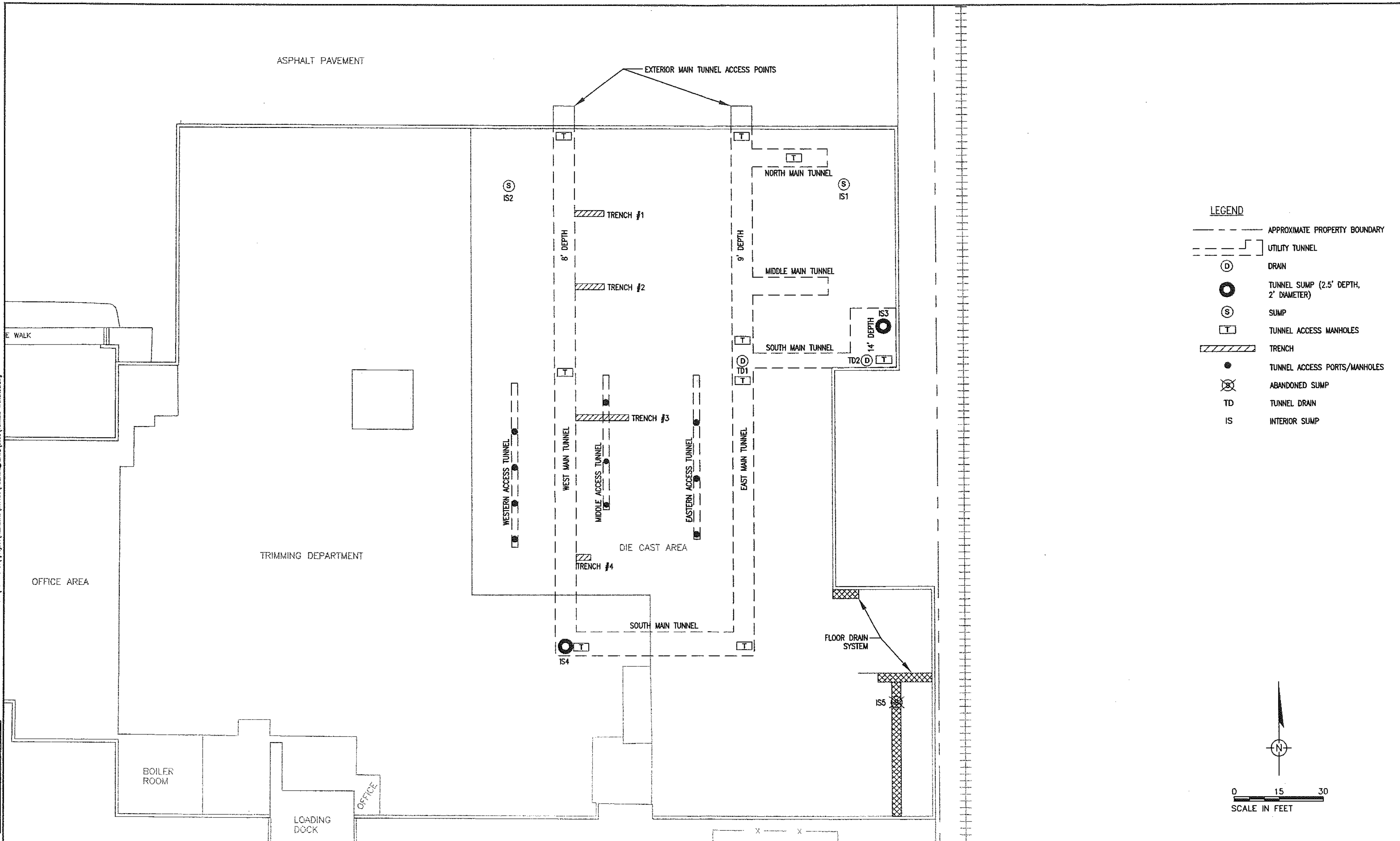
PROJECT MANAGER | DEPARTMENT MANAGER | LEAD DESIGN PROF. | CHECKED BY

SHEET TITLE: SITE LAYOUT AND UTILITY CORRIDORS

TASK/PHASE NUMBER | DRAWN BY

PROJECT NUMBER: WI001096

DRAWING NUMBER: 2



ASPHALT PAVEMENT
EXTERIOR MAIN TUNNEL ACCESS POINTS
T
IS2
IS1
NORTH MAIN TUNNEL
TRENCH #1
8' DEPTH
9' DEPTH
MIDDLE MAIN TUNNEL
TRENCH #2
IS3
14' DEPTH
SOUTH MAIN TUNNEL
TD1
TD2
E WALK
TRENCH #3
WESTERN ACCESS TUNNEL
WEST MAIN TUNNEL
MIDDLE ACCESS TUNNEL
EASTERN ACCESS TUNNEL
EAST MAIN TUNNEL
TRIMMING DEPARTMENT
DIE CAST AREA
TRENCH #4
OFFICE AREA
SOUTH MAIN TUNNEL
FLOOR DRAIN SYSTEM
IS4
IS5
BOILER ROOM
OFFICE
LOADING DOCK
LEGEND
APPROXIMATE PROPERTY BOUNDARY
UTILITY TUNNEL
DRAIN
TUNNEL SUMP (2.5' DEPTH, 2' DIAMETER)
SUMP
TUNNEL ACCESS MANHOLES
TRENCH
TUNNEL ACCESS PORTS/MANHOLES
ABANDONED SUMP
TD TUNNEL DRAIN
IS INTERIOR SUMP
N
0 15 30
SCALE IN FEET

Path\Name : G:\project\MILDIECAS\WI1196\PCBACM_ABATE\cadd\Tunnels Trenches.dwg

Page Setup: 5100-11X17
Pen Table: ----

REV. ISSUED DATE DESCRIPTION

KEYPLAN

SEAL

ARCADIS

FORMER MILWAUKEE DIE CASTING COMPANY
MILWAUKEE, WISCONSIN

PROJECT MANAGER | DEPARTMENT MANAGER | LEAD DESIGN PROF. | CHECKED BY

SHEET TITLE: LAYOUT OF INTERIOR TRENCHES, FLOOR DRAINS, AND TUNNELS

TASK/PHASE NUMBER

DRAWN BY

PROJECT NUMBER: WI001196

DRAWING NUMBER: 3

APPENDIX A

ARCADIS

Appendix A

Regulatory Correspondences

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8716
TTY 414-263-8713

August 19, 2008

File Ref: FID#241228240
BRRTS# 02-41-000023

Ms. Theresa Slyman
nonresponsive

Subject: Immediate and Remedial Environmental Response Actions Required for Property at 4132 N. Holton Street, Milwaukee, Wisconsin
Formerly referred to as Milwaukee Die Casting Property

Dear Ms. Slyman:

The purpose of this letter is to inform you of your legal responsibility under Wisconsin Statute 292.11, as property owner, to take actions to address the hazardous substance discharges, both historical and on-going, at the 4132 N. Holton Street property, in Milwaukee, Wisconsin.

On July 11, 2008, you were ordered by the Milwaukee Metropolitan Sewerage District (MMSD) to cut off all sanitary sewer lateral connections to the MMSD main sanitary sewer adjacent to your property at 4132 N. Holton Street in Milwaukee, Wisconsin. The Department of Natural Resources was notified of this enforcement action, and has been informed of the response actions taken to address the MMSD order.

On August 9, 2008, the Department was notified by MMSD that additional response actions were being required. A site inspection was made on August 11, 2008 by Department representatives, to observe site conditions after the initial response actions had been taken. There is a concrete lined pit or sump structure located outside the east wall of the building on the property, which had been observed by MMSD officials to contain oily liquid. Samples of the oily liquid were collected by MMSD, and analytical results found PCBs at over 18,000 parts per million in this liquid. The original MMSD order included emptying out this sump. Your contractor, Environmental Audits, had pumped the sump contents to within about 6 inches of the base (a 15-feet deep structure), and reports to have disposed of five 55-gallon drums of liquid and two 55-gallon drums of debris and decontamination waste from this removal action, all as PCB containing waste. During the August 11, 2008 site visit, the liquid level within the exterior sump was observed to have risen to within 6 feet of the surface, and the liquid appeared to have a dark oil layer floating on top, similar to previous conditions found by your contractor and MMSD. Observation made within the building on August 11, 2008, included the presence of oily liquid in sub-floor structures. The amount of liquid present is not known, nor is the connection of sub-floor structures to drains and the exterior sump known. Analytical results of liquid samples collected by your contractor from sub-floor structures found PCBs at levels exceeding 1000 parts per million.

On August 18, 2008, your contractor reported that a second sump had been discovered outside the building, north of the known exterior sump. According to your contractor, the second sump also contains oily liquid. The connections to and from this second sump are not known.

The liquid in the two exterior sumps presents a potential on-going discharge to the environment, due to the presence of PCBs. The source of the additional liquid that has entered the original exterior sump is not known, but appears to be coming from beneath the building. Thus the oily liquids present in sub-floor structures also present a potential on-going discharge to the environment. The identification of a second sump with liquid of

similar appearance magnifies the need to complete a removal of oily liquids from the property as soon as possible to prevent environmental releases and limit the overall cost response actions.

Previous soil and groundwater samples collected by your former environmental consultants found PCBs and chlorinated solvents in soil and groundwater at the property. Although Milwaukee Die Casting was ordered to complete a remedial action in response to the identified conditions, actions were not completed.

Legal Responsibilities:

Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (3) Wisconsin Statutes, states:

- RESPONSIBILITY. A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Code chapters NR 700 through NR 749 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Chapter NR 708 includes provisions for immediate actions in response to limited contamination. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

Steps to Take:

- two sumps

1. Within 10 days of the date of this letter, you must take action to stop discharges to the exterior sumps, and prevent any overflows of the sumps. This should include:
    a. Remove all liquids and sludge from the sumps and connected outflow and inflow piping, accessible by pumping.
    b. Block inflow piping, to prevent the entrance of additional liquid or other hazardous substances to the sumps from beneath the building.
    c. Properly dispose of all liquids and sludge removed, and all decontamination waste, in accordance with state and federal regulations.

2. Within 30 days of the date of this letter, you must take action to prevent further discharges to the environment from the sub-floor structures under your building.
    a. Remove accessible liquid and sludge from sub-floor structures.
    b. Evaluate and sample other sub-floor structures and storm sewers, which could act as sources or conduits for continuing releases to the environment.
    c. Arrange for decontamination or removal of all sub-floor structures and storm sewers that are identified in the evaluation as sources or conduits for continuing releases to the environment. This includes the exterior sumps.
    d. Properly dispose of all liquid, sludge, decontamination waste and asbestos containing materials in accordance with state and federal regulations.

3. Within 60 days of the date of this letter, you must take additional actions to prevent further discharges to the environment from sub-floor structures and/or storm sewers, as identified in the evaluation required above. This may include but is not limited to additional liquid or sludge removal and disposal, disconnection of storm sewers or replacement of storm sewers, evaluation and removal of drum and on-floor tank contents.

4. Provide the Department with documentation of the required response actions and proper management and disposal of wastes removed, including sample results, transportation manifests and disposal receipts and approvals, photographs and reports signed by authorized environmental professionals, as follows:
    a. Provide advance notification of the timeframe for actions to be taken.
    b. Provide analytical results for samples collected from the site within 48 hours of receipt by you or your consultant.
    c. Provide all documentation requested above within 90 days of completion of the immediate response actions required above.
    d. Provide documentation that you have hired an environmental consultant to complete the soil and groundwater remedial actions that are needed at the property within 90 days of completion of the immediate response actions required above.

Your contractor, Environmental Audits, has provided status updates to the Department on the progress of your actions to stop the on-going discharges. We are, therefore, informed that you are working to contract for the removal of liquids from the property. We appreciate being kept informed and will make site visits to document your progress. Please be aware that under s. 292.11 and s. 292.31, Stats., the Department may undertake environmental response actions where responsible parties are unwilling or unable to perform them. The Department is also authorized to seek reimbursement from responsible parties for costs incurred by the Department to conduct environmental response actions.

The Department was informed that you have been ordered by the City of Milwaukee to sever all connections to the storm sewer system from your building. Work required by this letter is consistent with the City's order. Actions and time frames specified by this letter do not remove any actions or time frames already required by other governmental units. Please notify the Department if for any reason you require more time, or are unable to perform the actions required by this letter.

You are required to follow all State and Federal laws regarding removal and disposal of asbestos containing materials from the property during your response actions. Care should be taken to prevent worker and public exposure to asbestos, and to prevent the spread of asbestos within and beyond the building. Any questions you or your contractors have regarding state asbestos regulations may be directed to Mark Davis, DNR Air Management, Southeast Region, (414) 263-8674.

All correspondence regarding this site should be mailed to:

Victoria Stovall, Environmental Program Associate
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2300 North Martin Luther King Drive
Milwaukee, WI 53212

Unless otherwise requested, please send only one copy of plans and reports. To speed processing, correspondence should reference the BRRTS and FID numbers (if assigned) shown at the top of this letter.

If you want a formal response from the Department on a specific submittal, please be aware that a review fee is required in accordance with ch. NR 749, Wis. Adm. Code. If a fee is not submitted with your reports, you should proceed under the advice of your consultant to complete the site investigation to maintain your compliance with the spills law and chs. NR 700 through NR 749. **Do not delay the investigation of your site by waiting for a Department response.** We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative codes and should be able to answer your questions on meeting cleanup requirements.

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System ("BRRTS"), a version of which appears on the Department's Internet site. You may view the information related to your site at any time (http://www.dnr.state.wi.us/org/aw/rr/brrts) and use the feedback system to alert us to any errors in the data.

Please call me at (414) 263-8758 for more information about the RR Program or visit the RR web site. http://www.dnr.state.wi.us/org/aw/rr. You may also contact me for all other questions regarding this letter.

Thank you for your cooperation.

Sincerely,

Pamela A. Mylotta, Hydrogeologist
Remediation & Redevelopment Program
Southeast Region, Milwaukee Service Center

C: George Slyman – nonresponsive
John Ruetz – Environmental Audits
Foster Finco – City of Milwaukee Neighborhood Services
Peter Potczewski – Milwaukee Metropolitan Sewerage District
Bradley Grams – U.S. Environmental Protection Agency Region 5

APPENDIX B

ARCADIS

Appendix B

Waste Stream Profile and
Manifest Documentation

VEOLIA
ENVIRONMENTAL SERVICES

SHIPPING DOCUMENT	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Shipping Document Tracking Number
	WID006102305	1		ZZ 00095129

5. Generator's Name and Mailing Address
Milwaukee Die Casting
400 N Holton
Milwaukee, WI 53212
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Veolia ES Industrial Services, Inc — U.S. EPA ID Number: TXR 000077970

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Veolia ES Emerald Park Landfill LLC
W194 S8289 S 124th Street
Muskego, WI 53150
Facility's Phone: 414 529-1360
U.S. EPA ID Number:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Codes
	1. Wood Debris (Broken Pallets) (≤ 60) Non-Hazardous/Non Regulated	1	CM	20	Y	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. **GENERATOR S/OFFEROR S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name: Theresa Clymer — Signature — Month: 10 — Day: 13 — Year: 09

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Shipment

Transporter 1 Printed/Typed Name — Signature — Month — Day — Year

Transporter 2 Printed/Typed Name — Signature — Month — Day — Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Shipping Document Tracking Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month — Day — Year

19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a

Printed/Typed Name — Signature — Month — Day — Year

GENERATOR / SHIPPER'S INITIAL COPY

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

VEOLIA
ENVIRONMENTAL SERVICES

SHIPPING DOCUMENT	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Shipping Document Tracking Number
	WI D006102365	1		ZZ 00095128

GENERATOR

5. Generator's Name and Mailing Address
Milwaukee Die Casting
4333 N Holton
Milwaukee, WI 53212
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Veolia ES Industrial Services Inc. — U.S. EPA ID Number: TXR 000077970

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Veolia ES Emerald Park Landfill LLC
W134 S6639 S124th St.
Muskego, WI 53150
Facility's Phone: 1-414-529-1360
U.S. EPA ID Number:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Codes
	1. Wood Debris (Broken Pallets) (C and D) Non-Hazardous / Non Regulated	1	CM	20	Y	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name — Signature — Month 10 Day 16 Year 08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Shipment

Transporter 1 Printed/Typed Name — Signature — Month 10 Day 16 Year 08

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Shipping Document Tracking Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a

Printed/Typed Name — Signature — Month Day Year

GENERATOR / SHIPPER'S INITIAL COPY

VEOLIA ENVIRONMENTAL SERVICES

SHIPPING DOCUMENT	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Shipping Document Tracking Number
	WID006102305	1		ZZ 00095127

5. Generator's Name and Mailing Address: Milwaukee Die Casting, 4132 N Holton, Milwaukee, WI 53212

Generator's Site Address (if different than mailing address):

Generator's Phone:

6. Transporter 1 Company Name: [illegible] Inc — U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: [illegible] LLC — U.S. EPA ID Number:

Facility's Phone: [illegible]

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Codes
	1. Wood Debris ([illegible]) (C & D) Non-[illegible] Reg. [illegible]	1	CM	[illegible]		
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. **GENERATOR S/OFFEROR S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name	Signature	Month	Day	Year
Thomas [illegible]	[signature]	10	09	08

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Shipment

	Printed/Typed Name	Signature	Month	Day	Year
Transporter 1	[illegible]	[signature]	[illegible]	[illegible]	[illegible]
Transporter 2					

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Shipping Document Tracking Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a

Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

GENERATOR / SHIPPER'S INITIAL COPY

5-100-01

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of: 2
3. Emergency Response Phone: 1-800-468-1760
4. Manifest Tracking Number: 000068622 **SKS**

5. Generator's Name and Mailing Address:
MILWAUKEE DIE CAST
4132 N HOLTON AVE
MILWAUKEE WI 53212
Generator's Phone: 414-431-4261

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC. — U.S. EPA ID Number: WID981097769

7. Transporter 2 Company Name: SAFETY-KLEEN SYSTEMS, INC. — U.S. EPA ID Number: TXR000050930

8. Designated Facility Name and Site Address: CLEAN HARBORS DEER PARK, L 050018
2027 BATTLEGROUND ROAD
LA PORTE TX 77571
SEE [illegible]
Facility's Phone: 281-930-2300
U.S. EPA ID Number: TXD055141378

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ POLYCHLORINATED BIPHENYLS, LIQUID 9 UN2315 PGII	[illegible]	DF	977	K	PCB3 OUTS 2081
[illegible]	2. [illegible]	[illegible]	[illegible]	73	K	PCB3 [illegible]
	3.					
	4.					

14. Special Handling Instructions and Additional Information: SK TRCK#10977490[illegible] 000326472[illegible]

SK AUTH'D TO USE SUBSEQUENT CARRIERS: 41078, 41471, 81681, 82739, 85399

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [illegible] Signature: [illegible] Month/Day/Year: 7/[illegible]/08

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: [illegible] Signature: [illegible] Month/Day/Year: 7/[illegible]/08
Transporter 2 Printed/Typed Name: [illegible] Signature: [illegible] Month/Day/Year: 7/[illegible]/08

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator): RE-DIRECT
SAFETY-KLEEN, SYSTEMS, INC
1722 COOPER CREEK RD.
DENTON, TEXAS 76208
U.S. EPA ID Number: TXD077603371 65120
Facility's Phone: [illegible]

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H040 2. H040 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: [illegible] Signature: [illegible] Month/Day/Year: 8/5/08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

1)0007876 2) [illegible] 3) 4)
1)200182273/40282595 2)[illegible]

DESIGNATED FACILITY'S COPY

To Generator

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of: [illegible]
3. Emergency Response Phone: 1-800-[illegible]
4. Manifest Tracking Number: 000768632 **SKS**

5. Generator's Name and Mailing Address:
MILWAUKEE-[illegible]
[illegible] N BOLTON AVE
MILWAUKEE WI 53217

Generator's Site Address (if different than mailing address)

Generator's Phone: 414-431-4262

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC — U.S. EPA ID Number: WID981097769

7. Transporter 2 Company Name: SAFETY-KLEEN SYSTEMS, INC. — U.S. EPA ID Number: TXR000050930

8. Designated Facility Name and Site Address: SEE SEC.18B — CLEAN HARBORS DEER PARK, L 050036, 2027 BATTLEGROUND ROAD, LA PORTE TX 77571 — U.S. EPA ID Number: TXD055141378

Facility's Phone: 281-930-2300

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ POLYCHLORINATED BIPHENYLS, LIQUID 9 UN2315 PGII	2	DF	399	K	PCB2 [illegible]
X	2. RQ Polychlorinated Biphenyls Liquid 9 UN 2315 PGII	1	[illegible]	36	K	PCB2 [illegible]
	3.					
	4.					

14. Special Handling Instructions and Additional Information: SR TRCK#109776292 0003368734
out of service 1/15/2008

SK AUTH'D TO USE SUBSEQUENT CARRIERS:41076,41471,81681,82739,85309

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [illegible signature] — Signature: [signature] — Month/Day/Year: 7 30 08

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Scott Studemann — Signature: [signature] — Month/Day/Year: 7 30 08
Transporter 2 Printed/Typed Name: Alan Ross — Signature: [signature] — Month/Day/Year: 07 07 08

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator): SAFETY-KLEEN SYSTEMS, INC. 1722 COOPER CREEK RD, DENTON TX 76208 — U.S. EPA ID Number: TXD077603371
Facility's Phone: 940-383-5300 — TXD077603371

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Dana George — Signature: [signature] — Month/Day/Year: 09 15 08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

1)0007876 2) [illegible] 3) 4)
1)200182273/40282595
[illegible handwritten numbers]

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

__ Veolia ES Location MENOMONEE FALLS FACILITY MENOMONEE FALLS WI |552 | 476 |

|__| Invoice Address OFFICE CITY ST

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____

Address 4132 N HOLTON State Wastestream No. _____

City MILWAUKEE State WI Country US ZIP 53212 ____

NAICS(SIC) Code 3363 331521 _____ _____ Source G19 Origin 1 Form W519 System Type _____

---

2. Waste Name NON-HAZARDOUS ACID LIQUID Lab or Waste Area _____

3. Process Generating Waste

aluminum die casting operations

4. Shipping Name NON-REGULATED MATERIAL, NON-RCRA, NON-DOT.

Hazard Class NONE UN/NA No. NONE PG ___ RQ amt 0 lb Waste: N PIH: N IH: N DWW: N P: N

RQ Des: 1._____ 2._____

DOT Des: 1.NON-HAZARDOUS ACID LIQUID 2._____

5. Waste Codes NONE _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids	
a ___ < 2	a ___ <.8	a ___ < 80	0 - 20% suspended	0 - 0 % ash
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	0 - 20% settleable	0 - 0 % water solubility
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	0 - 20% dissolved	0 - 0 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200		
e ___ > 12.5	e ___ > 1.2	e X > 200	Free Liquid	80 -100 %
3.0- 7.0 exact	.9- 1.0 exact	f ___ no flash ___ - ___ exact	VOC	0 - 0 %

Physical State

s X solid
m ___ semi-solid
l X liquid
p ___ pumpable semi-solid
f ___ flowable powder
g ___ gas
a ___ aerosol
r ___ pressurized liquid
d ___ debris per 40 CFR 268.45
h ___ sharps
q ___ pumpable liquid

Hazardous Characteristics

a ___ air reactive
w ___ water reactive
c ___ cyanide reactive
f ___ sulfide reactive
e ___ explosive
o ___ oxidizing acid
p ___ peroxide former
r ___ radioactive or NRC regulated
s ___ shock sensitive
t ___ temp sensitive
m ___ polymerization/monomer
n ___ OSHA carcinogen
i ___ infectious
h ___ inhalation hazard
Zone: _

Odor

a none _____
b mild _____
c strong _____
describe _____

Halogens

Br 0 - 0 % Bromine
Cl 0 - 0 % Chlorine
F 0 - 0 % Fluorine
I 0 - 0 % Iodine

Layers: a ____ multilayered: b ___X bi-layered: c ____ single phase

---

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	X low(water)	___ low(water)	___ low(water)	_____
	___ solid	X solid	___ solid	

WIP NO. 61082

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ HOC < 1000 ppm ___ HOC > 1000 ppm ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges		Units
WATER	80.00	100.00	%
RUST, DIRT, SCALE	.00	20.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
   If yes:
   Is the wastestream subject to Notification/Control Requirements? Yes __ No X
   Benzene Concentration .00 ppm
   Does it contain >= 10% water? Yes __ NOX
   What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
   Volatile Organic Concentration .00 ppmw
   CC Approved Analytical Method? Yes __ No X
   Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: 5512A2 Type/Size: DM 55 GAL OPEN HEAD (17H) DM
_____ Type/Size: __ _____

Shipping Frequency: Units 2.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA A. SLYMAN — Name(Print or Type)
330-242-2404 — Phone
10/29/08 — Date
Theresa A. Slyman — Signature
Land owner — Title

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 61082

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

__ Veolia ES Location MENOMONEE FALLS FACILITY MENOMONEE FALLS WI |552 | 476 |
|__| Invoice Address OFFICE CITY ST

Veolia ES TSDF requested _____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____
Address 4132 N HOLTON State Wastestream No. _____
City MILWAUKEE State WI Country US ZIP 53212 ____
NAICS(SIC) Code 3363 331521 _____ _____ Source G19 Origin 1 Form W319 System Type _____

---

2. Waste Name CAUSTIC WHITE POWDER/NON-TSCA Lab or Waste Area _____
3. Process Generating Waste
CLEANUP OF ALUMINUM DIE CASTING OPERATION
4. Shipping Name NON-REGULATED MATERIAL, NON-RCRA, NON-DOT.
Hazard Class NONE UN/NA No. NONE PG ___ RQ amt 0 lb Waste: N PIH: N IH: N DWW: N P: N
RQ Des: 1. _____ 2. _____
DOT Des: 1. CAUSTIC WHITE POWDER 2. _____
5. Waste Codes NONE _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____
Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids	
a ___ < 2	a ___ <.8	a ___ < 80	100 - 100% suspended	0 - 0 % ash
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	100 - 100% settleable	0 - 0 % water solubility
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	100 - 100% dissolved	0 - 0 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200		
e ___ > 12.5	e ___ > 1.2	e X > 200	Free Liquid	0 - 0 %
8.0- 11.0 exact	1.2- 1.6 exact	f ___ no flash ___ - ___ exact	VOC	0 - 0 %

Physical State	Hazardous Characteristics		Odor
s X solid	a ___ air reactive	r ___ radioactive or NRC regulated	a none ___
m ___ semi-solid	w ___ water reactive	s ___ shock sensitive	b mild ___
l ___ liquid	c ___ cyanide reactive	t ___ temp sensitive	c strong ___
p ___ pumpable semi-solid	f ___ sulfide reactive	m ___ polymerization/monomer	describe _____
f ___ flowable powder	e ___ explosive	n ___ OSHA carcinogen	
g ___ gas	o ___ oxidizing acid	i ___ infectious	
a ___ aerosol	p ___ peroxide former	h ___ inhalation hazard	
r ___ pressurized liquid		Zone: _	
d ___ debris per 40 CFR 268.45			
h ___ sharps			
q ___ pumpable liquid			

Halogens	
Br	0 - 0 % Bromine
Cl	0 - 0 % Chlorine
F	0 - 0 % Fluorine
I	0 - 0 % Iodine

Layers: | a ____ multilayered: b ____ bi-layered: c X single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	WHT
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	___ low(water)	___ low(water)	___ low(water)	_____
	X solid	___ solid	___ solid	

WIP NO. 61088

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ HOC < 1000 ppm ___ HOC > 1000 ppm ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges		Units
[INORGANIC SALT (NON-HAZARDOUS]	99.90	100.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
   If yes:
   Is the wastestream subject to Notification/Control Requirements? Yes __ No X
   Benzene Concentration .00 ppm
   Does it contain >= 10% water? Yes __ NoX
   What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
   Volatile Organic Concentration .00 ppmw
   CC Approved Analytical Method? Yes __ No X
   Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: 55IA2 Type/Size: DM 55 GAL OPEN HEAD (17H) DM
55IH2 Type/Size: DF 55 GAL OPEN HEAD PLASTIC DRUM

Shipping Frequency: Units 1.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA A. SLYMAN	330-2432404	10/29/08
Name (Print or Type)	Phone	Date
Theresa A. Slyman	Landowner	
Signature	Title	

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 61088

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

|__| Veolia ES Location MENOMONEE FALLS FACILITY (OFFICE) MENOMONEE FALLS (CITY) WI (ST) |552 | 476 |

|__| Invoice Address

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____
Address 4132 N HOLTON State Wastestream No. _____
City MILWAUKEE State WI Country US ZIP 53212 ____
NAICS(SIC) Code 3363 331521 _____ _____ Source G11 Origin I Form W206 System Type _____

2. Waste Name DIE SLICK 914 (EMULSIFIED OIL) Lab or Waste Area _____
3. Process Generating Waste
unused/off-spec product
4. Shipping Name NON-REGULATED MATERIAL, NON-RCRA, NON-DOT,
Hazard Class NONE UN/NA No. NONE PG ___ RQ amt 0 lb Waste: N PIH: N IH: N DWW: N P: N
RQ Des: 1. _____ 2. _____
DOT Des: 1. DIE SLICK 914/EMULSIFIED PETROLEUM OIL 2. _____
5. Waste Codes NONE
Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids
a ___ < 2	a ___ <.8	a ___ < 80	0 - 0% suspended 0 - 0 % ash
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	0 - 0% settleable 0 - 0 % water solubili
c ___ 5 - 9	c X 1.0	c ___ 100 - 140	0 - 0% dissolved 15000 -20000 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200	
e ___ > 12.5	e ___ > 1.2	e X > 200	Free Liquid 100 -100 %
5.0- 10.0 exact	____ - ____ exact	f ___ no flash ____ - ____ exact	VOC 0 - 0 %

Physical State
s ___ solid
m ___ semi-solid
l X liquid
p ___ pumpable semi-solid
f ___ flowable powder
g ___ gas
a ___ aerosol
r ___ pressurized liquid
d ___ debris per 40 CFR 268.45
h ___ sharps
q ___ pumpable liquid

Hazardous Characteristics
a ___ air reactive
w ___ water reactive
c ___ cyanide reactive
f ___ sulfide reactive
e ___ explosive
o ___ oxidizing acid
p ___ peroxide former
r ___ radioactive or NRC regulated
s ___ shock sensitive
t ___ temp sensitive
m ___ polymerization/monomer
n ___ OSHA carcinogen
i ___ infectious
h ___ inhalation hazard
Zone: _

Odor
a none ____
b mild ____
c strong ____
describe _____

Halogens
Br 0 - 0 % Bromine
Cl 0 - 0 % Chlorine
F 0 - 0 % Fluorine
I 0 - 0 % Iodine

Layers: a ___ multilayered: b ___ bi-layered: c X single phase

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	WHT
	X medium(oil)	___ medium(oil)	___ medium(oil)	___
	___ low(water)	___ low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

WIP NO. 62156

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ HOC < 1000 ppm ___ HOC > 1000 ppm ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges		Units
PETROLEUM OILS	5.00	20.00	%
OILS	.00	100.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
   If yes:
   Is the wastestream subject to Notification/Control Requirements? Yes __ No X
   Benzene Concentration .00 ppm
   Does it contain >= 10% water? Yes __ No X
   What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
   Volatile Organic Concentration .00 ppmw
   CC Approved Analytical Method? Yes __ No X
   Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: 55IA1 Type/Size: DM 55 GAL CLOSED HEAD (17E) DM
_____ Type/Size: __

Shipping Frequency: Units 3.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA SLYMAN — Name(Print or Type)
330 722 5097 — Phone
11/08/08 — Date
Theresa Slyman — Signature
Landfarmer — Title

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 52156

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

|__| Invoice Address

Veolia ES Location MENOMONEE FALLS FACILITY (OFFICE) | MENOMONEE FALLS (CITY) | WI (ST) | 552 | 476 |

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____
   Address 4132 N HOLTON State Wastestream No. _____
   City MILWAUKEE State WI Country US ZIP 53212
   NAICS(SIC) Code 3363 331521 _____ _____ Source G11 Origin 1 Form W110 System Type _____

---

2. Waste Name OAKITE ENPROX 714 (CAUSTIC LIQUID) Lab or Waste Area _____
3. Process Generating Waste
   unused/off-spec product
4. Shipping Name WASTE SODIUM HYDROXIDE SOLUTION _____
   Hazard Class 8 UN/NA No. UN1824 PG II RQ amt 0 lb Waste: Y PIH: N IH: N DWW: N P: N
RQ Des: 1. _____ 2. _____
DOT Des: 1. _____ 2. _____
5. Waste Codes D002 _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____
   Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids
a ___ < 2	a ___ <.8	a ___ < 80	0 - 0% suspended
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	0 - 0% settleable
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	0 - 0% dissolved
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200	
e X > 12.5	e ___ > 1.2	e X > 200	
___ - ___ exact	1.4 - 1.5 exact	f ___ no flash ___ - ___ exact	

0 - 0 % ash
0 - 0 % water solubili
0 - 0 BTU/lb
Free Liquid 100 -100 %
VOC 0 - 0 %

Physical State
s ___ solid
m ___ semi-solid
l X liquid
p ___ pumpable semi-solid
f ___ flowable powder
g ___ gas
a ___ aerosol
r ___ pressurized liquid
d ___ debris per 40 CFR 268.45
h ___ sharps
q ___ pumpable liquid

Hazardous Characteristics
a ___ air reactive
w ___ water reactive
c ___ cyanide reactive
f ___ sulfide reactive
e ___ explosive
o ___ oxidizing acid
p ___ peroxide former
r ___ radioactive or NRC regulated
s ___ shock sensitive
t ___ temp sensitive
m ___ polymerization/monomer
n ___ OSHA carcinogen
i ___ infectious
h ___ inhalation hazard
Zone: _

Odor
a none ____
b mild ____
c strong ____
describe _____

Halogens
Br 0 - 0 % Bromine
Cl 0 - 0 % Chlorine
F 0 - 0 % Fluorine
I 0 - 0 % Iodine

Layers: a ___ multilayered: b ___ bi-layered: c X single phase

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	CLR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	X low(water)	___ low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

WIP NO. 62167

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ HOC < 1000 ppm ___ HOC > 1000 ppm ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges		Units
SODIUM HYDROXIDE, SOLID (DRY, FLAKE, BEAD OR GRANULAR)	40.00	60.00	%
WATER	40.00	60.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
   If yes:
   Is the wastestream subject to Notification/Control Requirements? Yes __ No X
   Benzene Concentration .00 ppm
   Does it contain >= 10% water? Yes __ No X
   What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
   Volatile Organic Concentration .00 ppmw
   CC Approved Analytical Method? Yes __ No X
   Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: 05HI Type/Size: DF 5 GAL CLOSED HEAD PLASTIC DRUM
_____ Type/Size: __ _____

Shipping Frequency: Units 1.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA SLYMAN — Name(Print or Type)
330-722-5097 — Phone
11/08/08 — Date
Theresa Slyman — Signature
Lab Coordinator — Title

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 62167

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

|__| Veolia ES Location MENOMONEE FALLS FACILITY (OFFICE) MENOMONEE FALLS (CITY) WI (ST) |552 | 476 |

|__| Invoice Address

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____
   Address 4132 N HOLTON State Wastestream No. _____
   City MILWAUKEE State WI Country US ZIP 53212 ____
   NAICS(SIC) Code 3363 331521 _____ _____ Source G11 Origin 1 Form W203 System Type _____

---

2. Waste Name COMBUSTIBLE LIQUID Lab or Waste Area _____
3. Process Generating Waste
   UNUSED/OFF-SPEC PRODUCT
4. Shipping Name WASTE FLAMMABLE LIQUIDS, n.o.s. _____
   Hazard Class 3 ___ UN/NA No. UN1993 PG I RQ amt 0 lb Waste: Y PIH: N IH: N DWW: N P: N
   RQ Des: 1. _____ 2. _____
   DOT Des: 1. PETROLEUM DISTILLATES 2. _____
5. Waste Codes D001 _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____
   Wastewater _____ Non Wastewater X Sub Category D001-IL Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids
a ___ < 2	a ___ <.8	a ___ < 80	0 - 5% suspended 0 - 0 % ash
b ___ 2 - 5	b X .8 - 1.0	b ___ 80 - 100	0 - 5% settleable 0 - 0 % water solubili
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	0 - 5% dissolved 7000 -15000 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200	
e ___ > 12.5	e ___ > 1.2	e ___ > 200	Free Liquid 95 -100 %
5.0- 10.0 exact	- exact	f ___ no flash 70.0-140.0 exact	VOC 0 - 0 %

Physical State

s ___ solid
m ___ semi-solid
l X liquid
p ___ pumpable semi-solid
f ___ flowable powder
g ___ gas
a ___ aerosol
r ___ pressurized liquid
d ___ debris per 40 CFR 268.45
h ___ sharps
q ___ pumpable liquid

Hazardous Characteristics

a ___ air reactive
w ___ water reactive
c ___ cyanide reactive
f ___ sulfide reactive
e ___ explosive
o ___ oxidizing acid
p ___ peroxide former
r ___ radioactive or NRC regulated
s ___ shock sensitive
t ___ temp sensitive
m ___ polymerization/monomer
n ___ OSHA carcinogen
i ___ infectious
h ___ inhalation hazard
Zone: _

Odor

a none ____
b mild ____
c strong ____
describe _____

Halogens

Br 0 - 0 % Bromine
Cl 0 - 0 % Chlorine
F 0 - 0 % Fluorine
I 0 - 0 % Iodine

Layers: | a ___ multilayered: b ___ bi-layered: c X single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	X low(water)	___ low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

WIP NO. 62169

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ VOC < 1000 ppm ___ VOC > 1000 ppm ___

Chemical Composition (M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen)

Constituents	Ranges		Units
PETROLEUM DISTILLATES	95.00	100.00	%
RUST, DIRT, SCALE	.00	5.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
   If yes:
   Is the wastestream subject to Notification/Control Requirements? Yes __ No X
   Benzene Concentration .00 ppm
   Does it contain >= 10% water? Yes __ No X
   What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
   Volatile Organic Concentration .00 ppmw
   CC Approved Analytical Method? Yes __ No X
   Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: 05HH1 Type/Size: DF 5 GAL CLOSED HEAD PLASTIC DRUM
_____ Type/Size: __ _____

Shipping Frequency: Units 1.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA SLYMAN (Name(Print or Type)) 330-722-5097 (Phone) 11/08/08 (Date)

Theresa Slyman (Signature) Landowner (Title)

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 62169

VEOLIA
ENVIRONMENTAL SERVICES

CONFIRMATION LETTER

October 16, 2008

Mr. Robert Leszczynski
Veolia ES – Industrial Services
1215 Klement Street
Fort Atkinson, WI 53538

Re: Confirmation Letter for PCB impacted Debris

Attention: Mr. Leszczynski

We are pleased to confirm Veolia ES – Technical Solutions, L.L.C. (VESTS) - Controlled Waste Division's approval of your waste material as described below. The attached profile for the waste materials was prepared by Controlled Waste Division based upon information provided by you. It is important that no changes be made to the profile without Controlled Waste's consent. If the profile meets with your approval, please call 1-800-255-5092 to schedule shipment of your waste materials.

VESTS Profile Number:
61082 – Non-hazardous acid liquid
61088 – Caustic White Powder/Non-TSCA
62156 – Die Slick 914 (Emulsified Oil)
62167 – Oakite Enprox 714 (Caustic Liquid)
62169 – Combustible Liquid
62174 – PCB Labpacks
62177 – Caustic Liquid with PCBs

Approved Mgmt. Facility:
VESTS Controlled Waste Division or another VESTS approved facility

Disposal Method:
61082 – Solidification/Landfill
61088 – Bulk for Landfill
62156 – Energy Recovery
62167 – Depack/Repack for Waste Water Treatment
62169 – Depack/Repack for Energy Recovery
62174 – Labpack for TSCA/RCRA Incineration
62177 – TSCA/RCRA Incineration

Veolia Environmental Services – Technical Solutions, LLC
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
Tel: 262-255-0863 • Fax: 262-255-5794
www.veoliaes.com

VEOLIA
ENVIRONMENTAL SERVICES

Profile Expiration Date:
10/13/09

Special Conditions:
All loads must be scheduled forty-eight(48) hours in advance.
Damaged and leaking containers will not be accepted.
A signed and completed Land Disposal Notification and Certification must accompany each shipment, if the waste is hazardous as per RCRA.

Applicable state and local taxes are included in these disposal prices. All wastes are priced as profiled, invoiced as actually received. Invoices shall be paid no later than thirty (30) days from the date of receipt. All terms are governed by the Agreement previously executed between our companies. The prices quoted above are subject to change by VESTS upon thirty (30) days' prior written notice to you unless otherwise specifically provided or per the terms of our Agreement. If we have not previously concluded a Service Agreement with your company, one is enclosed for your convenience. Please sign and return it to us as soon as possible. Also, if you have not signed the Waste Profile Sheet, please sign and return it before scheduling your material.

If you have any questions or would like to make changes to the profile, please contact your representative.
Thank you for this opportunity to be of service.

Allan G. Kountz
Veolia Environmental Services – Technical Solutions, L.L.C. - Controlled Waste Division

Veolia Environmental Services – Technical Solutions, LLC
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
Tel: 262-255-0863 • Fax: 262-255-5794
www.veoliaes.com

VEOLIA
ENVIRONMENTAL SERVICES

Please pr[illegible]orm designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	W I D 0 0 6 1 0 2 3 0 5	2	(877) 818-0087	000155044 VES

GENERATOR

5. Generator's Name and Mailing Address: ARCADIS, 126 N JEFFERSON ST, MILWAUKEE, WI 53202
Generator's Phone: 414 277-6231
Generator's Site Address (if different than mailing address): MILWAUKEE DIE CASTING, 4132 N HOLTON, MILWAUKEE, WI 53212

RECEIVED
DEC 01 2008
ARCADIS

6. Transporter 1 Company Name: VEOLIA ES TECHNICAL SOLUTIONS — U.S. EPA ID Number: N J D 9 8 0 9 3 1 3 6 9
7. Transporter 2 Company Name — U.S. EPA ID Number:
8. Designated Facility Name and Site Address: VEOLIA ES TECHNICAL SOLUTIONS, W124 N9451 BOUNDARY, MENOMONEE FALLS, WI 53051 — U.S. EPA ID Number: W I D 0 0 3 9 6 7 1 4 8
Facility's Phone: 262 255-0605

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN1993, WASTE FLAMMABLE LIQUIDS, n.o.s., (PETROLEUM DISTILLATES), 3, I	0 0 1	D F	00027	P	D001		
X	2. UN1824, WASTE SODIUM HYDROXIDE SOLUTION, 8, II	0 0 1	D F	00044	P	D002		
	3. NON-REGULATED MATERIAL, NON-RCRA, NON-DOT., (NON-HAZARDOUS ACID LIQUID)	0 0 2	D F	00110	G	NONE		
	4. NON-REGULATED MATERIAL, NON-RCRA, NON-DOT., (NON-HAZARDOUS ACID LIQUID)	0 0 2	D F	00094	P	NONE		

14. Special Handling Instructions and Additional Information: 1) ERG:128 W:62169 A:CWDDPK3 2) ERG:154 W:62167 A:CWDDPK8B 3) W:61082 A:CWDSGRNHL 4) W:61082 A:CWDSGRNHL + ER Service Contracted by VESTS PC165 WI FIELD SERVICES

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Theresa Slyman — Signature: Theresa Slyman — Month: 11 Day: 14 Year: 08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: David J Symonds — Signature: [signature] — Month: 11 Day: 14 Year: 08
Transporter 2 Printed/Typed Name — Signature — Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141	H141	H141	H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: RICHARD WADE — Signature: [signature] — Month: 11 Day: 19 Year: 08

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number: WI0006102305

22. Page: 2 of 2

23. Manifest Tracking Number: 000155044VES

24. Generator's Name: MILWAUKEE DIE CASTING

25. Transporter _____ Company Name — U.S. EPA ID Number

26. Transporter _____ Company Name — U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
	5. NON-REGULATED MATERIAL, NON-RCRA, NON-DOT, (CAUSTIC WHITE POWDER)	002	DF	00543	P	NONE		
	6. NON-REGULATED MATERIAL, NON-RCRA, NON-DOT, (WATER BASED OIL)	003	DM	00165	G	NONE		

GENERATOR

32. Special Handling Instructions and Additional Information: 5) W:61088 A:CWDSORNHS 6) W:62536 A:CWDO2LNHL

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
5. H141 | 6. H141

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

| | Recertification

	Veolia ES Location MENOMONEE FALLS FACILITY	MENOMONEE FALLS	WI	552	476
	Invoice Address	OFFICE	CITY	ST	

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____

Address 4132 N HOLTON State Wastestream No. _____

City MILWAUKEE State WI Country US ZIP 53212 ____

NAICS(SIC) Code 3363 331521 _____ _____ Source G19 Origin 1 Form W307 System Type _____

---

2. Waste Name METAL FINES Lab or Waste Area _____

3. Process Generating Waste

Cleanup of Alumium Die Cast Operations

4. Shipping Name NON-REGULATED MATERIAL, NON-RCRA, NON-DOT.

Hazard Class NONE UN/NA No. NONE PG ___ RQ amt 0 lb Waste: N PIH: N IH: N DWW: N P: N

RQ Des: 1. _____ 2. _____

DOT Des: 1. METAL FINES 2. _____

5. Waste Codes NONE _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids	
a ___ < 2	a ___ <.8	a ___ < 80	100 - 100% suspended	0 - 0 % ash
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	100 - 100% settleable	0 - 0 % water solubility
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	100 - 100% dissolved	0 - 0 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200		
e ___ > 12.5	e ___ > 1.2	e X > 200	Free Liquid	0 - 0 %
5.0- 10.0 exact	1.0- 1.5 exact	f ___ no flash ____ - ____ exact	VOC	0 - 0 %

Physical State	Hazardous Characteristics		Odor
s X solid	a ___ air reactive	r ___ radioactive or NRC regulated	a none ____
m ___ semi-solid	w ___ water reactive	s ___ shock sensitive	b mild ____
l ___ liquid	c ___ cyanide reactive	t ___ temp sensitive	c strong ____
p ___ pumpable semi-solid	f ___ sulfide reactive	m ___ polymerization/monomer	describe _____
f ___ flowable powder	e ___ explosive	n ___ OSHA carcinogen	
g ___ gas	o ___ oxidizing acid	i ___ infectious	Halogens
a ___ aerosol	p ___ peroxide former	h ___ inhalation hazard	Br 0 - 0 % Bromine
r ___ pressurized liquid		Zone: _	Cl 0 - 0 % Chlorine
d ___ debris per 40 CFR 268.45			F 0 - 0 % Fluorine
h ___ sharps			I 0 - 0 % Iodine
q ___ pumpable liquid			

Layers: | a ____ multilayered: b ____ bi-layered: c ___X single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	BLK
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	___ low(water)	___ low(water)	___ low(water)	_____
	X solid	___ solid	___ solid	

WIP NO. 63709

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ HOC < 1000 ppm ___ HOC > 1000 ppm ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges		Units
NON-HAZARDOUS METAL FINES	100.00	100.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
   If yes:
   Is the wastestream subject to Notification/Control Requirements? Yes __ No X
   Benzene Concentration .00 ppm
   Does it contain >= 10% water? Yes __ No X
   What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
   Volatile Organic Concentration .00 ppmw
   CC Approved Analytical Method? Yes __ No X
   Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: 55HA2 Type/Size: DM 55 GAL OPEN HEAD (17H) DM
55HM2 Type/Size: DF 55 GAL OPEN HEAD PLASTIC DRUM

Shipping Frequency: Units 8.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

Total PCB Concentration is 9.0 mg/kg.

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA SLYMAN _____ 11/19/08
Name (Print or Type) Phone Date

Theresa Slyman Lab Manager
Signature Title

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 63709

Veolia ES Technical Solutions, L.L.C.
Menomonee Falls, Wisconsin

Subject:
Polychlorinated Biphenyl (PCB) Concentration Statement for Metal Fines Waste Stream, Former Milwaukee Die Casting Company Facility, 4132 North Holton Street, Milwaukee, Wisconsin.

Date:
24 November 2008

To Whom It May Concern:

It is understood that a waste profile has been generated for a metal fines waste stream from the above referenced site. In additional to this waste profile, which I signed on November 19, 2008, you are also requiring a signed statement regarding the total polychlorinated biphenyl (PCB) concentration of the waste stream, which is 9 parts per million (ppm).

By signing this statement below, I am certifying that, to the best of my knowledge, this waste did not contain PCB's at regulated levels and that any PCB's detected at less than 50 pppm are not from a PCB source containing greater than 50 ppm concentration nor the result of impermissible dilution.

Should you have any questions, please feel free to give ARCADIS a call.

Sincerely,
Theresa Slyman

Property Owner Signature: Theresa Slyman

Printed Name: TERESA SLYMAN

Title: Customer

Date: 11/21/08

VEOLIA
ENVIRONMENTAL SERVICES

CONFIRMATION LETTER

November 15, 2008

Mr. Robert Leszczynski
Veolia ES – Industrial Services
1215 Klement Street
Fort Atkinson, WI 53538

Re: Confirmation Letter for Metal Fines Profile

Attention: Mr. Leszczynski

We are pleased to confirm Veolia ES – Technical Solutions, L.L.C. (VESTS) - Controlled Waste Division's approval of your waste material as described below. The attached profile for the waste materials was prepared by Controlled Waste Division based upon information provided by you. It is important that no changes be made to the profile without Controlled Waste's consent. If the profile meets with your approval, please call 1-800-255-5092 to schedule shipment of your waste materials.

VESTS Profile Number:
63709

Approved Mgmt. Facility:
VESTS Controlled Waste Division or another VESTS approved facility

Waste Name:
Metal Fines

Disposal Method:
Bulk for Subtitle D Landfill

Profile Expiration Date:
11/15/09

Special Conditions:
All loads must be scheduled forty-eight(48) hours in advance.
Damaged and leaking containers will not be accepted.
A signed and completed Land Disposal Notification and Certification must accompany each shipment, if the waste is hazardous as per RCRA.

Veolia Environmental Services – Technical Solutions, LLC
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
Tel: 262-255-0863 • Fax: 262-255-5794
www.veoliaes.com

VEOLIA
ENVIRONMENTAL SERVICES

Applicable state and local taxes are included in these disposal prices. All wastes are priced as profiled, invoiced as actually received. Invoices shall be paid no later than thirty (30) days from the date of receipt. All terms are governed by the Agreement previously executed between our companies. The prices quoted above are subject to change by VESTS upon thirty (30) days' prior written notice to you unless otherwise specifically provided or per the terms of our Agreement. If we have not previously concluded a Service Agreement with your company, one is enclosed for your convenience. Please sign and return it to us as soon as possible. Also, if you have not signed the Waste Profile Sheet, please sign and return it before scheduling your material.

If you have any questions or would like to make changes to the profile, please contact your representative. Thank you for this opportunity to be of service.

Allan G. Kountz

Veolia Environmental Services – Technical Solutions, L.L.C. - Controlled Waste Division

Veolia Environmental Services – Technical Solutions, LLC
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
Tel: 262-255-0863 • Fax: 262-255-5794
www.veoliaes.com

VEOLIA
ENVIRONMENTAL SERVICES

VEOLIA ENVIRONMENTAL SERVICES WID006102305 1 (877) 618-0087 MILWAUKEE DIE CASTING

SHIPPING DOCUMENT	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Shipping Document Tracking Number
	WID006102305			ZZ 00095130

GENERATOR

5. Generator's Name and Mailing Address: Arcadis, 126 N Jefferson St, Milwaukee, WI 53202, Attn. Ben Verberg
Generator's Phone: 414/277-6231

Generator's Site Address (if different than mailing address): Milwaukee Diecast, 4132 N Holton, Milwaukee, WI 53212

6. Transporter 1 Company Name: ~~126 N JEFFERSON ST, MILWAUKEE, WI 53202~~ ~~4132 N HOLTON, MILWAUKEE, WI 53212~~ U.S. EPA ID Number:

7. Transporter 2 Company Name: VEOLIA ES TECHNICAL SOLUTIONS U.S. EPA ID Number: NJD008063136 9

8. Designated Facility Name and Site Address: VEOLIA ES TECHNICAL SOLUTIONS W124 N9451 BOUNDARY RD MENOMONEE FALLS, WI 53051
U.S. EPA ID Number: WID003867148
Facility's Phone: 262 255-6655

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Codes
	1. NON-REGULATED MATERIAL, NON-RCRA, NON-DOT., (METAL FINES)	9	DM	7200	P	NONE
	2.					
	3.					
	4.					

RECEIVED DEC 22 2008 ARCADIS

14. Special Handling Instructions and Additional Information
1) WP# 63709 CWD~~GRN~~HS -|- ER Service Contracted by VESTS
OZL

15. **GENERATOR S/OFFEROR S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name: Theresa Slyman | Signature: Theresa Slyman | Month 12 | Day 1 | Year 08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Shipment

Transporter 1 Printed/Typed Name: VICTOR VERDEV | Signature | Month 12 | Day 01 | Year 08

Transporter 2 Printed/Typed Name: | Signature | Month | Day | Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Shipping Document Tracking Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a

Printed/Typed Name: William Banks | Signature: William Banks | Month 12 | Day 04 | Year 08

DESIGNATED FACILITY TO GENERATOR

VEOLIA
ENVIRONMENTAL SERVICES

Veolia Environmental Services- Controlled Waste Division (WID003967148) has received waste material from **Milwaukee Die Casting**, on **11/19/08 and 12/4/08** , described on Waste Manifests, **000155044VES and ZZ00095130**.

By accepting the waste products described on the shipping papers referenced above, Veolia Environmental Services, certifies to the generator that the transportation, storage, and processing methods employed are in accordance with Veolia permit parameters, TSCA, RCRA, HMTA, OHSA, and all applicable federal, state, and local laws.

I certify on behalf of the above listed facility that, to the best of my knowledge, the waste was managed in compliance with all applicable laws, regulations, permits and licenses.

William Banks

Veolia Environmental Services - Controlled Waste Division Signature

Tracking # 3241760

WASTE CHARACTERIZATION REPORT

☐ *I authorize EQ – The Environmental Quality Company to choose the appropriate facility and method of waste management from the technologies offered at the EQ facilities identified below.*

☐ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☒ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & PCB Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: 313-923-0080 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619 Phone: 813-623-5463 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Universal Waste Handling)	2000 Ferry Street, Detroit, MI 48211 Phone: 313-923-0080 Fax: 313-922-8419	EPA ID # MIK 939 928 313
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # IND 161 049 309
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # GAR 000 039 776
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: PCB/Friable Asbestos

Section 1 – Generator & Customer Information

SIC/NAICS* 3363/331521

Generator EPA ID # WID006102305

Generator Milwaukee Die Casting

Facility Address 4132 N Holton

City Milwaukee State WI Zip 53212

County Milwaukee

Mailing Address 126 North Jefferson St Suite 400

City Milwaukee State WI Zip 53202

Generator Contact Ben Verburg

Title Consultant

Phone 414/276-7742 Fax 414/276-7603

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. _____

Invoicing Company Veolia ES Technical Solutions

Address W124 N9451 Boundary Road

City Menomonee Falls State WI Zip 53051

Country US

Invoicing Contact Allan Kount?

Phone 262/255-6655 Fax 262/255-5744

Technical Contact Ben Verburg

Phone 414/276-7742 Fax 414/276-7603

Mobile _____ Pager _____

E-mail _____

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 10 Cubic yard boxes

☒ One Time Only ☐ Year ☐ Quarter ☐ Month

2.2) DOT Shipping Name Environmentally Hazardous Substances Solids n.o.s. (Asbestos, Polychlorinated Biphenyls) Class 9, UN3077, II

2.3) Is this waste surcharge exempt? ☐ Yes ☐ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (check all that apply)

☐ Bulk Solid (Yd³ < 2000 lbs/yd³)
☐ Bulk Solid (Ton >2000 lbs/yd³)
☐ Bulk Liquids (Gallon)
☐ Totes, Size _____
☒ Cubic Yard Boxes/Bags
☐ Drums, Size _____
☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 – Physical Characteristics

3.1) Color varies 3.2) Odor None

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F: ☒ Solid ☐ Dust/Powder ☐ Liquid ☐ Sludge

3.5) What is the pH of this waste? ☐ ≤2 ☐ 2.1-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F

3.7) Does this waste contain? (check all that apply)

☐ Biodegradable Sorbants	☐ Azides	☐ None	☐ Free Liquids	☐ Oily Residue	☐ Metal Fines	
☐ Shock Sensitive Waste	☐ Reactive Waste	☐ Ammonia	☐ Water Reactive	☐ Biohazard	☐ Aluminum	
☐ Asbestos – non-friable	☒ Asbestos – friable	☐ Radioactive Waste	☐ Explosives	☐ Pyrophoric Waste	☐ Isocyanates	
		☐ Dioxins	☐ Picrates			

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical components, etc.)

Piping Steel (Weighted) 0 to 100 %
Pipe Wrapping Asbestos 0 to 100 %
PPE 0 to 10 %
Paper, Plastic, Cardboard 0 to 20 %
Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

Cleanout of Aluminum Die casting Company. Containerized per 40 CFR Part 61 Subpart M containers standard. No free liquids. Containers 298 gal.

Section 5 – Is This Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: Please list applicable waste code(s): X Yes

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☐ Yes ☒ No

5.3) Do any State Hazardous Waste Codes apply? ☒ Yes ☐ No PCB 6

5.4) Is this waste intended for wastewater treatment? ☐ Yes* ☒ No

*If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.*

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☒ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☒ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥ 250 ppm (D003)? ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥ 500 ppm (D003)? ☐ Yes ☒ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used to the determination. Either "Below" or "Above" MUST be checked for each constituent.

INITIAL H E R E

Based On: ☒ Generator Knowledge ☐ Analysis* ☐ MSDS*

*Please attach a copy. Analysis or MSDS are required for EQFL Non-hazardous wastes.

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above
D005	Barium	100	☒ Below ☐ Above
D006	Cadmium	1	☒ Below ☐ Above
D007	Chromium	5	☒ Below ☐ Above
D008	Lead	5	☒ Below ☐ Above
D009	Mercury	0.2	☒ Below ☐ Above
D010	Selenium	1	☒ Below ☐ Above
D011	Silver	5	☒ Below ☐ Above
D012	Endrin	0.02	☒ Below ☐ Above
D013	Lindane	0.4	☒ Below ☐ Above
D014	Methoxychlor	10	☒ Below ☐ Above
D015	Toxaphene	0.5	☒ Below ☐ Above
D016	2,4-D	10	☒ Below ☐ Above
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above
D018	Benzene	0.5	☒ Below ☐ Above
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above
D020	Chlordane	0.03	☒ Below ☐ Above
D021	Chlorobenzene	100	☒ Below ☐ Above
D022	Chloroform	6.0	☒ Below ☐ Above
D023	o-Cresol	200	☒ Below ☐ Above

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D024	m-Cresol	200	☒ Below ☐ Above
D025	p-Cresol	200	☒ Below ☐ Above
D026	Cresols	200	☒ Below ☐ Above
D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above
D028	1,2-Dichloroethane	0.5	☒ Below ☐ Above
D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above
D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above
D031	Heptachlor	0.008	☒ Below ☐ Above
D032	Hexachlorobenzene	0.13	☒ Below ☐ Above
D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above
D034	Hexachloroethane	3.0	☒ Below ☐ Above
D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above
D036	Nitrobenzene	2	☒ Below ☐ Above
D037	Pentachlorophenol	100	☒ Below ☐ Above
D038	Pyridine	5	☒ Below ☐ Above
D039	Tetrachloroethylene	0.7	☒ Below ☐ Above
D040	Trichloroethylene	0.5	☒ Below ☐ Above
D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above
D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above
D043	Vinyl Chloride	0.2	☒ Below ☐ Above

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☒ No

If yes, please list the constituents in Section 11.

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste codes: _____

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☐ Yes ☒ No

7.2) Is this a Universal waste? ☐ Yes ☒ No

7.3) Is this a Recyclable Commodity? (e.g., computer monitors, free mercury, etc.) ☐ Yes ☒ No

7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☒ No

7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☒ No

If you answered "yes" to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☐ None ☐ 0-5 ppm ☐ 6-49 ppm ☒ 50-499 ppm ☐ 500+ ppm

8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☒ Yes ☐ No

If you answered "no" to 8.1 and 8.2, please skip to Section 9.

8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☒ No

If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm

8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☒ Yes ☐ No

8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☒ No

8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☒ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants -- VOHAP's or Volatile Organic Compounds – VOC's?)

For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide

9.2) Is the site, or waste, subject to any other MACT or NESHAP? ☐ Yes, please specify: _____ ☒ No

9.3) Does this waste stream contain Benzene? ☐ Yes ☒ No

If you answered "no" to 9.3, please skip to Section 10.

9.4) Does the waste stream come from a facility with one of the SIC/NAICS codes listed under the NESHAP? ☐ Yes ☒ No

9.5) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No

For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.

If you answered "no" to question 9.4 and 9.5, please skip to Section 10.

9.6) Does the waste contain >10% water? ☐ Yes ☐ No

9.7) What is the TAB quantity for your facility? _____ Mg/Year

9.8) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No

9.9) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.

(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No

*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____

10.2) Is this waste intended for reclamation? ☐ Yes ☒ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: *Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)*

Constituent	Concentration	UHC?		Constituent	Concentration	UHC?	
_____	_____	☐ Yes	☐ No	_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No	_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No	_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No	_____	_____	☐ Yes	☐ No
_____	_____	☐ Yes	☐ No	_____	_____	☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Theresa Slyman Printed Name THERESA SLYMAN

Company _____ Title Landowner Date 11/08/08

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

November 24, 2008

Customer: VEOLIA ES TECHNICAL SOLUTIONS LLC
Fax: (262) 255-7990

ENVIRONMENTAL MANAGER
MILWAUKEE DIE CASTING
C/O ARCADIS
126 N. JEFFERSON ST.
SUITE 400
MILWAUKEE, WI 53202

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: K084101WDI

Generator EPA ID: WID006102305 **Expires On:** 11/10/2009
Waste Common Name: PCB/FRIABLE ASBESTOS
Comments: Waste is double-contained, Waste containers comply with NESHAP Asbestos 40 CFR Part 61 Subpart M container standards (ref. 40 CFR 61.145(c) and 40 CFR 61.150), No free liquids in the waste containers and Waste containers must be at least 90% full.
10 CYB ONe time only

Primary Waste Code: PCB6
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

Date Scanned: 12/19/2008

Invoice: 40093222 Receipt 03-01 1168582 Manifest 000155041VES

PACKING SUMMARY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WIDD06102306

4. Manifest Tracking Number: 000155041 VES

5. Generator's Name and Mailing Address: Generator Number: 42961 ARCADIS, 126 N. JEFFERSON ST, MILWAUKEE, WI 53202

Generator's Site Address (if different than mailing address): MILWAUKEE CASTING, 4132 N HOLTON, MILWAUKEE, WI 53212

Manifest Number: 000155041VES

Generator's Phone: 414 277-6231

6. Transporter 1 Company Name: VEOLIA ES TECHNICAL SOLUTIONS — U.S. EPA ID Number: NJD066031388

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: WAYNE DISPOSAL INC., 49350 N I-94 SERVICE DRIVE, BELLEVILLE, MI 48111 — U.S. EPA ID Number: MID048090633

Facility's Phone: 800 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, n.o.s., (ASBESTOS, POLYCHLORINATED BIPHENYLS), 9, III	6	CF	1360	K	PCB6
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: 1) WP # 63709 SDB# 101WDI (OUT OF SERVICE DATE 12/11/08 -|- ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Theresa Slyman — Signature: Theresa Slyman — Month 12 Day 1 Year 08

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.: Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Victor Verdev — Signature — Month 12 Day 01 Year 08

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number — Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

18. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Chad Heuy — Signature — Month 12 Day 8 Year 08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

2346824

CERTIFICATE OF DISPOSAL

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as PCB Solid

and specified on Manifest # 000155041VES, Line Item 1 has been landfilled on

Dec 7, 200 5 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc.

(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

Invoice: 40093222

Receipt 03-01 168582

Cod 000155041VES

Clean Harbors Environmental Services, Inc.
1672 E. Highland Road
Twinsburg, OH 44087
330.425.3825
www.cleanharbors.com

September 9, 2008

Mr. Greg Slyman
Milwaukee Die Cast
4132 N. Holton Street
Milwaukee, WI 53212

RE: Clean Harbors Order Number: I72047678

Dear Mr. Slyman:

Enclosed please find a signed copy of your paperwork, which indicates acceptance of your material at our Clean Harbors PPM facility in Twinsburg, Ohio.

Date Received: 9/5/08

Document Number: 000676691FLE

If you any questions, please feel free to contact me in our Twinsburg, Ohio operations office at (330) 425-3825.

Sincerely,

Lorean Crowder
Compliance Guard
Clean Harbors PPM, LLC

Attachments

C01T4901

172047678-002 SC PPW 8/13/2008

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: ~~WID006122305~~ WID006102305	2. Page 1 of 1	3. Emergency Response Phone: (800) 483-3718	4. Manifest Tracking Number: 000676691 FLE

5. Generator's Name and Mailing Address

Milwaukee Die Cast
4132 N. Holton St.
Milwaukee, WI 53212

Generator's Site Address (if different than mailing address): SAME

Generator's Phone: (330) 607-1751

6. Transporter 1 Company Name: Clean Harbors Environmental Services Inc — U.S. EPA ID Number: MAD039322250

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: ~~Clean Harbors PPM LLC, Highway 169 North, Coffeyville, KS 67337~~ CLEAN HARBORS PPM LLC, 1672 EAST HIGHLAND RD., TWINSBURG, OH 44087 — U.S. EPA ID Number: ~~KSD981506025~~ OHD 986 975 399

Facility's Phone: ~~(620) 251-5880~~ Phone - 330-425-3825

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, 9, PG III	1	TT	18345	K	NONE
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

1. CR327932B ERG#171

255035T OUT OF SERVICE 9-4-08 EST. 4500 GAL

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name — Signature — Month Day Year

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: JAMES R. KLEMENCIC — Signature: James R. Klemencic — Month Day Year: 09 04 08

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy: Generator Signed Line 20 instead of Line 15

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

error on line 1 gen id #is WID006102305

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H141	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Luanna Ross / Greg Sutton — Signature — Month Day Year: 9-5-08 / 9 3 08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

Veolia ES Location MENOMONEE FALLS FACILITY (OFFICE) MENOMONEE FALLS (CITY) WI (ST) |552 | 476 |

|__| Invoice Address

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____

Address 4132 N HOLTON State Wastestream No. _____

City MILWAUKEE State WI Country US ZIP 53212 ____

NAICS(SIC) Code 3363 331521 _____ _____ Source G19 Origin 1 Form W219 System Type _____

2. Waste Name PCB IMPACTED OIL/WATER Lab or Waste Area _____

3. Process Generating Waste

cleanup and decontamination of former aluminum die casting facility

4. Shipping Name WASTE POLYCHLORINATED BIPHENYLS, LIQUID

Hazard Class 9 UN/NA No. UN2315 PG II RQ amt 1 lb Waste: Y PIH: N IH: N DWW: N P: N

RQ Des: 1. POLYCHLORINATED BIPHENYLS 2. _____

DOT Des: 1. _____ 2. _____

5. Waste Codes PCBI _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

6. Physical and chemical properties:

pH

a ___ < 2
b ___ 2 - 5
c ___ 5 - 9
d ___ 9 - 12.5
e ___ > 12.5
5.0 - 10.0 exact

Specific Gravity

a ___ <.8
b ___ .8 - 1.0
c X 1.0
d ___ 1.0 - 1.2
e ___ > 1.2
___ - ___ exact

Flash Point(F)

a ___ < 80
b ___ 80 - 100
c ___ 100 - 140
d ___ 140 - 200
e X > 200
f ___ no flash ___ - ___ exact

Solids

0 - 5% suspended 0 - 0 % ash
0 - 5% settleable 0 - 0 % water solubili
0 - 5% dissolved 1000 - 3000 BTU/lb

Free Liquid 95 - 100 %
VOC 0 - 0 %

Physical State

s ___ solid
m ___ semi-solid
l X liquid
p ___ pumpable semi-solid
f ___ flowable powder
g ___ gas
a ___ aerosol
r ___ pressurized liquid
d ___ debris per 40 CFR 268.45
h ___ sharps
q ___ pumpable liquid

Hazardous Characteristics

a ___ air reactive
w ___ water reactive
c ___ cyanide reactive
f ___ sulfide reactive
e ___ explosive
o ___ oxidizing acid
p ___ peroxide former
r ___ radioactive or NRC regulated
s ___ shock sensitive
t ___ temp sensitive
m ___ polymerization/monomer
n ___ OSHA carcinogen
i ___ infectious
h ___ inhalation hazard
Zone: _

Odor

a none ____
b mild ____
c strong ____
describe _____

Halogens

Br 0 - 0 % Bromine
Cl 0 - 0 % Chlorine
F 0 - 0 % Fluorine
I 0 - 0 % Iodine

Layers: a ___ multilayered: b X bi-layered: c ___ single phase

Viscosity by Layer:	Top Layer	Second Layer	Bottom Layer	Color
	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	X medium(oil)	___ medium(oil)	___ medium(oil)	___
	___ low(water)	X low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

WIP NO. 57452

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ HOC < 1000 ppm ___ HOC > 1000 ppm ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

	Constituents	Ranges		Units
S,T,U,	POLYCHLORINATED BIPHENYLS (SHIPMENT BY HIGHWAY)	.00	5000.00	M
	WATER	90.00	100.00	%
	OIL	.00	10.00	%
	RUST, DIRT, SCALE	.00	5.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes X No__
   PCB Concentration 5000.00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
    If yes:
    Is the wastestream subject to Notification/Control Requirements? Yes __ No X
    Benzene Concentration .00 ppm
    Does it contain >= 10% water? Yes __ NoX
    What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
    Volatile Organic Concentration .00 ppmw
    CC Approved Analytical Method? Yes __ No X
    Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

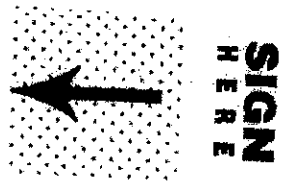
Packaging: VACTRU Type/Size: TT VAC TRUCKS
_____ Type/Size: __ _____

Shipping Frequency: Units 10000.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM GALLONS DESCRIPTION: _____

15. Additional Information :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA A SLYMAN _____ _____  SIGN HERE
Name(Print or Type) Phone Date

Theresa A. Slyman _____
Signature Title

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 57452

VEOLIA
ENVIRONMENTAL SERVICES

CONFIRMATION LETTER

October 14, 2008

Mr. Robert Leszczynski
Veolia ES – Industrial Services
1215 Klement Street
Fort Atkinson, WI 53538

Re: Confirmation Letter for PCB impacted Oil/Water

Attention: Mr. Leszczynski

We are pleased to confirm Veolia ES – Technical Solutions, L.L.C. (VESTS) - Controlled Waste Division's approval of your waste material as described below. The attached profile for the waste materials was prepared by Controlled Waste Division based upon information provided by you. It is important that no changes be made to the profile without Controlled Waste's consent. If the profile meets with your approval, please call 1-800-255-5092 to schedule shipment of your waste materials.

VESTS Profile Number:
57452

Approved Mgmt. Facility:
VESTS Controlled Waste Division or another VESTS approved facility

Waste Name:
PCB impacted oil/water

Disposal Method:
TSCA Incineration

Profile Expiration Date:
10/06/09

Special Conditions:
All loads must be scheduled forty-eight(48) hours in advance.
Damaged and leaking containers will not be accepted.
A signed and completed Land Disposal Notification and Certification must accompany each shipment, if the waste is hazardous as per RCRA.

Veolia Environmental Services – Technical Solutions, LLC
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
Tel: 262-255-0863 • Fax: 262-255-5794
www.veoliaes.com

VEOLIA
ENVIRONMENTAL SERVICES

Applicable state and local taxes are included in these disposal prices. All wastes are priced as profiled, invoiced as actually received. Invoices shall be paid no later than thirty (30) days from the date of receipt. All terms are governed by the Agreement previously executed between our companies. The prices quoted above are subject to change by VESTS upon thirty (30) days' prior written notice to you unless otherwise specifically provided or per the terms of our Agreement. If we have not previously concluded a Service Agreement with your company, one is enclosed for your convenience. Please sign and return it to us as soon as possible. Also, if you have not signed the Waste Profile Sheet, please sign and return it before scheduling your material.

If you have any questions or would like to make changes to the profile, please contact your representative. Thank you for this opportunity to be of service.

Allan G. Kountz

Veolia Environmental Services – Technical Solutions, L.L.C. - Controlled Waste Division

Veolia Environmental Services – Technical Solutions, LLC
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
Tel: 262-255-0863 • Fax: 262-255-5794
www.veoliaes.com

VEOLIA
ENVIRONMENTAL SERVICES

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WI D 0 0 6 1 0 2 3 9 5	1	(877) 816-0083	000155040 VES

GENERATOR

5. Generator's Name and Mailing Address
ARCADIS
126 N JEFFERSON ST
MILWAUKEE, WI 53202
Generator's Phone: 414 272-8321

Generator's Site Address (if different than mailing address)
MILWAUKEE DIE CASTING
4132 N HOLTON
MILWAUKEE WI 53212

6. Transporter 1 Company Name: TRIAD TRANSPORT INC
U.S. EPA ID Number: C M D 9 8 1 6 8 9 7 9 1

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address: VEOLIA ES TECHNICAL SOLUTIONS
HIGHWAY 73
3.5 MILES W. OF TAYLOR'S BAYOU
PORT ARTHUR, TX 77640
Facility's Phone: 409 736-2821
U.S. EPA ID Number: T X D 0 0 6 3 8 8 8 3 6

'08 NOV 3 7:53AM

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN2315, WASTE POLYCHLORINATED BIPHENYLS, LIQUID, 9, II, RQ (POLYCHLORINATED BIPHENYLS)	01	TT	15604	K	PCB1		
	2.							
	3.							
	4.							

RECEIVED
NOV 17 2008
ARCADIS

14. Special Handling Instructions and Additional Information
10/31/08. UNIQUE CONTAINER ID #: 105 1) APPROVAL #PTA057452 (PCB IMPACTED OIL/WATER) -I- OUT-OF-SERVICE DATE: PROJ. #490356D.18.166.
ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: THERESA SLYMAN
Signature: Theresa Slyman
Month: 10 Day: 31 Year: 08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Robert Rowlands
Signature: Robert Rowlands
Month: 10 Day: 31 Year: 08

Transporter 2 Printed/Typed Name
Signature
Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☒ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
30700 LBS
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H040			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: CARRIE SEIF
Signature:
Month: 11 Day: 03 Year: 08

VEOLIA
ENVIRONMENTAL SERVICES

Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3 5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

MILWAUKEE DIE CASTING
4132 N HOLTON
MILWAUKEE, WI 53212

ATTN: BEN VERBURG (ARCADIS)

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from MILWAUKEE DIE CASTING (Fed EPA ID - WID006102305) on 11/3/2008 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 000155040VES. Veolia ES Technical Solutions, L.L.C. hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 1

Profile Number: PTA057452
Veolia Tracking ID: 617459

Process	Veolia Unit ID	Treatment Date	Generator #	Inter-Company #	Date CD Was Issued
INCINERATION	1	11/6/2008	451009697000001010	451009697000001010	11/10/2008

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Paul V. Conrad
Material Services Manager

618469

2729/103
1 Comp.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
WIDQ061023015	1	(877) 818-0087	000155243 VES

GENERATOR

5. Generator's Name and Mailing Address
ARCADIS
126 N JEFFERSON ST
MILWAUKEE, WI 53202
Generator's Phone: 414 277-6231

Generator's Site Address (if different than mailing address)
MILWAUKEE DIE CASTING
4132 N HOLTON
MILWAUKEE, WI 53212

6. Transporter 1 Company Name
TRIAD TRANSPORT, INC.
U.S. EPA ID Number: OKD981588791

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
VEOLIA ES TECHNICAL SOLUTIONS
HIGHWAY 73
3.5 MILES W. OF TAYLOR'S BAYOU
PORT ARTHUR, TX 77640
Facility's Phone: 409 736-2821
U.S. EPA ID Number: TXD000838886

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, 9, II, RQ (POLYCHLORINATED BIPHENYLS)	1	TT	8350	K	PCB1 / OUTS2191
	2.					
	3.					
	4.					

RECEIVED
DEC 08 2008
ARCADIS

14. Special Handling Instructions and Additional Information
1) APPROVAL #PTA057452 (PCB IMPACTED OILWATER) - OUT-OF-SERVICE DATE: 12/11/08
UNIQUE CONTAINER ID#: 103 PROJ. #4903550.18.186
ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS
'08 DEC 3 7:16AM

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Theresa Slyman
Signature: Theresa Slyman
Month 12 Day 1 Year 08

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Wendell Gresham
Signature: Wendell Gresham
Month 12 Day 01 Year 08
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H040 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: CARRIE SEIT
Signature:
Month 12 Day 03 Year 08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

VEOLIA
ENVIRONMENTAL SERVICES

Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

MILWAUKEE DIE CASTING
4132 N HOLTON
MILWAUKEE, WI 53212

ATTN: BEN VERBURG (ARCADIS)

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from MILWAUKEE DIE CASTING (Fed EPA ID - WID006102305) on 12/3/2008 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 000155243VES. Veolia ES Technical Solutions, L.L.C. hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 1

Profile Number: PTA057452
Veolia Tracking ID: 618469

Process	Veolia Unit ID	Treatment Date	Generator #	Inter-Company #	Date CD Was Issued
INCINERATION	1	12/6/2008	WP1009145000001010	WP1009145000001010	12/9/2008

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Paul V. Conrad
Material Services Manager

Tracking #_____

WASTE CHARACTERIZATION REPORT

☐ *I authorize EQ – The Environmental Quality Company to choose the appropriate facility and method of waste management from the technologies offered at the EQ facilities identified below.*

☐ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☒ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & PCB Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211 Phone: 313-923-0080 Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502 Phone: 919-363-4700 Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619 Phone: 813-623-5463 Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Universal Waste Handling)	2000 Ferry Street, Detroit, MI 48211 Phone: 313-923-0080 Fax: 313-922-8419	EPA ID # MIK 939 928 313
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # IND 161 049 309
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # GAR 000 039 776
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: PCB Impacted Debris

Section 1 – Generator & Customer Information

SIC/NAICS* 3363/331521

Generator EPA ID # WID006102305

Generator Milwaukee Die Casting

Facility Address 4132 N Holton

City Milwaukee State WI Zip 53212

County US/ Milwaukee

Mailing Address 126 North Jefferson St Suite400

City Milwaukee State WI Zip 53202

Generator Contact Ben Verberg

Title Consultant

Phone 414/276-7740 Fax 414/276-7603

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. _____

Invoicing Company Veolia ES Technical Solutions

Address W124 N9451 Boundary Rd

City Menomonee Falls State WI Zip 53051

Country US

Invoicing Contact Allan Kountz

Phone 262/255-8655 Fax 262/255-5794

Technical Contact Ben Verberg

Phone 414/276-7740 Fax 414/276-7603

Mobile _____ Pager _____

E-mail _____

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency 100 cubic yards

☒ One Time Only ☐ Year ☐ Quarter ☐ Month

2.2) DOT Shipping Name Polychlorinated biphenyls, solid, 9, UN3432, II

2.3) Is this waste surcharge exempt? ☐ Yes ☒ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (check all that apply)

☒ Bulk Solid (Yd^3 < 2000 lbs/yd^3)

☐ Bulk Solid (Ton >2000 lbs/yd^3)

☐ Bulk Liquids (Gallon)

☐ Totes, Size _____

☐ Cubic Yard Boxes/Bags

☐ Drums, Size _____

☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard. If the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 – Physical Characteristics

3.1) Color Varies 3.2) Odor none

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F:	☒ Solid	☐ Dust/Powder	☐ Liquid	☐ Sludge	
3.5) What is the pH of this waste?	☐ ≤2	☐ 2.1-4.9	☒ 5-10	☐ 10.1-12.4	☐ ≥12.5
3.6) What is the flash point of this waste?	☐ <90°F	☐ 90-140°F	☐ 140-199°F	☒ >200°F	
3.7) Does this waste contain? (check all that apply)		☒ None	☐ Free Liquids	☐ Oily Residue	☐ Metal Fines
☐ Biodegradable Sorbants	☐ Amines	☐ Ammonia	☐ Water Reactive	☐ Biohazard	☐ Aluminum
☐ Shock Sensitive Waste	☐ Reactive Waste	☐ Radioactive Waste	☐ Explosives	☐ Pyrophoric Waste	☐ Isocyanates
☐ Asbestos – non-friable	☐ Asbestos – friable	☐ Dioxins	☐ Furans		

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

Debris:	to %	PCB	0 to 500 ppm
Used plastic, metal less than 3'x3'	100 to 100 %		to %
		Total:	100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

Cleaning and decontamination of a former aluminum die casting building

Section 5 – Is This Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules:			Please list applicable waste code(s):
5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)?	☐ Yes	☒ No	
5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)?	☐ Yes	☒ No	
5.3) Do any State Hazardous Waste Codes apply?	☒ Yes	☐ No	PCB1
5.4) Is this waste intended for wastewater treatment?	☐ Yes*	☒ No	

*If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.*

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☒ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☒ Yes ☐ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥ 250 ppm (D003)? ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥ 500 ppm (D003)? ☐ Yes ☒ No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☒ Generator Knowledge ☐ Analysis* ☐ MSDS*

***Please attach a copy. Analysis or MSDS are required for EQFL Non-hazardous wastes.**

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above
D005	Barium	100	☒ Below ☐ Above
D006	Cadmium	1	☒ Below ☐ Above
D007	Chromium	5	☒ Below ☐ Above
D008	Lead	5	☒ Below ☐ Above
D009	Mercury	0.2	☒ Below ☐ Above
D010	Selenium	1	☒ Below ☐ Above
D011	Silver	5	☒ Below ☐ Above
D012	Endrin	0.02	☒ Below ☐ Above
D013	Lindane	0.4	☒ Below ☐ Above
D014	Methoxychlor	10	☒ Below ☐ Above
D015	Toxaphene	0.5	☒ Below ☐ Above
D016	2,4-D	10	☒ Below ☐ Above
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above
D018	Benzene	0.5	☒ Below ☐ Above
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above
D020	Chlordane	0.03	☒ Below ☐ Above
D021	Chlorobenzene	100	☒ Below ☐ Above
D022	Chloroform	6.0	☒ Below ☐ Above
D023	o-Cresol	200	☒ Below ☐ Above

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D024	m-Cresol	200	☒ Below ☐ Above
D025	p-Cresol	200	☒ Below ☐ Above
D026	Cresols	200	☒ Below ☐ Above
D027	1,4-Dichlorobenzene	7.5	☒ Below ☐ Above
D028	1,2-Dichloroethane	0.5	☒ Below ☐ Above
D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above
D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above
D031	Heptachlor	0.008	☒ Below ☐ Above
D032	Hexachlorobenzene	0.13	☒ Below ☐ Above
D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above
D034	Hexachloroethane	3.0	☒ Below ☐ Above
D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above
D036	Nitrobenzene	2	☒ Below ☐ Above
D037	Pentachlorophenol	100	☒ Below ☐ Above
D038	Pyridine	5	☒ Below ☐ Above
D039	Tetrachloroethylene	0.7	☒ Below ☐ Above
D040	Trichloroethylene	0.5	☒ Below ☐ Above
D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above
D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above
D043	Vinyl Chloride	0.2	☒ Below ☐ Above

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☒ No

If yes, please list the constituents in Section 11.

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

Please list applicable waste code: _____

7.1) Is this a Michigan non-hazardous liquid industrial waste? ☐ Yes ☒ No
7.2) Is this a Universal waste? ☐ Yes ☒ No
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ☐ Yes ☒ No
7.4) Is this waste a recoverable petroleum product? ☐ Yes* ☒ No
7.5) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes* ☒ No

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☐ None ☐ 0-5 ppm ☐ 6-49 ppm ☒ 50-499 ppm ☒ 500+ ppm
8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☒ Yes ☐ No
If you answered "no" to 8.1 and 8.2, please skip to Section 9.
8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☒ No
If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm
8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☒ Yes ☐ No
8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☒ No
8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☒ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volatile Organic Compounds – VOC's?)
For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide
9.2) Is the site, or waste, subject to any other MACT or NESHAP? ☐ Yes, please specify: _____ ☒ No
9.3) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 9.3, please skip to Section 10.
9.4) Does the waste stream come from a facility with one of the SIC/NAICS codes listed under the NESHAP? ☐ Yes ☐ No
9.5) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.
If you answered "no" to question 9.4 and 9.5, please skip to Section 10.
9.6) Does the waste contain >10% water? ☐ Yes ☐ No
9.7) What is the TAB quantity for your facility? _____ Mg/Year
9.8) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No
9.9) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)
*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No
*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____
10.2) Is this waste intended for reclamation? ☐ Yes ☒ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: *Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)*

Constituent	Concentration	UHC?		Constituent	Concentration	UHC?	
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Theresa A. Slyman Printed Name THERESA A. SLYMAN SIGN HERE

Company _____ Title _____ Date _____

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Waste Amendment

Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive
Belleville, Michigan 48111
November 6, 2008

Approval: J084110WDI

Generator: MILWAUKEE DIE CASTING (WID006102305)
C/O ARCADIS
126 N. JEFFERSON ST.
SUITE 400
MILWAUKEE, WI 53202

Customer: VEOLIA ES TECHNICAL SOLUTIONS LLC (005287)

Common Name: PCB IMPACTED DEBRIS

Waste Codes: PCB1

In the event that a waste stream composition changes before the annual update is required, the generator may use this form to amend the waste profile. (A new sample may be required.) Please note, if the process generating the waste has changed, a new Waste Characterization Report, sample and analytical must be submitted for a new waste stream approval.

Please provide a detailed description below of the change(s) to the waste stream.

Amendment: Please amend the above approval for the following due to further remediation/demolition work at the Milwaukee Die Cast facility:

0-75% Crushed RCRA Empty drums
0-80% Cardboard from Cubic Yard Boxes
0-75% Cut of Poly/Steel Tanks less than 3'X3'
0-25% PPE/Gloves/Tyvek/Duct Tape
0-50% Dirt/Floorsweepings (Note: Filtercake consistency)
0-10% RCRA Empty Opened Plastic Jugs (Note***One pint to one gallon- containers will be open as to be able to visually inspect inside to assure they are empty)
Any floor sweepings will be at a minimal concentration and may contain dirt, ash, rust, wood, leaves and/or glass. No dusting issues or metal shavings should be present.

I, Theresa Sleyman, Londa Vanness.

Authorized Generator Signature *Printed Generator Name*

hereby certify that all information for the Approval listed above is accurate and complete.

Company Name: _____ Date: 11/08/08

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Waste Amendment

Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive
Belleville, Michigan 48111
October 29, 2008

Approval: J084110WDI

Generator: MILWAUKEE DIE CASTING (WID006102305)
C/O ARCADIS
126 N. JEFFERSON ST.
SUITE 400
MILWAUKEE, WI 53202

Customer: VEOLIA ES TECHNICAL SOLUTIONS LLC (005287)

Common Name: PCB IMPACTED DEBRIS

Waste Codes: PCB1

In the event that a waste stream composition changes before the annual update is required, the generator may use this form to amend the waste profile. (A new sample may be required.) Please note, if the process generating the waste has changed, a new Waste Characterization Report, sample and analytical must be submitted for a new waste stream approval.

Please provide a detailed description below of the change(s) to the waste stream.

Amendment: Please amend profile for 1 time only to include open-ended empty drums. These empty drums are located at the same generating site and were included in the load as a precautionary measure. While loading the PCB debris into the roll-off the crew felt that the drums may have been contaminated with PCB dust, and felt it best to include them in the bulk load of PCB debris.

I, Theresa A. Slyman, THERESA A. SLYMAN
Authorized Generator Signature *Printed Generator Name*

hereby certify that all information for the Approval listed above is accurate and complete.

Company Name: Landowner Date: 10/29/08

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Approval Notification

October 20, 2008

Customer: VEOLIA ENVIRONMENTAL SERVICES
Fax: (262) 255-7990

ENVIRONMENTAL MANAGER
MILWAUKEE DIE CASTING
C/O ARCADIS
126 N. JEFFERSON ST.
SUITE 400
MILWAUKEE, WI 53202

RECEIVED
OCT 29 2008
ARCADIS

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: J084110WDI

Generator EPA ID: WID006102305 **Expires On:** 10/13/2009
Waste Common Name: PCB IMPACTED DEBRIS
Comments: Must use PCB1 on Manifest, No Free liquids. Schedule into Wayne. 100 Yards One time only

Primary Waste Code: PCB1
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of: 1
3. Emergency Response Phone: [illegible]
4. Manifest Tracking Number: **000155241 VES**

5. Generator's Name and Mailing Address: ARCADIS [illegible] MILWAUKEE [illegible]

Generator's Site Address (if different than mailing address): [illegible] MILWAUKEE [illegible]

Generator's Phone: [illegible]

6. Transporter 1 Company Name: Triad Transport Inc. — U.S. EPA ID Number: OKD981588791

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: [illegible] BELLEVILLE, MI [illegible] — U.S. EPA ID Number: [illegible]

Facility's Phone: [illegible]

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. [illegible] POLYCHLORINATED BIPHENYLS [illegible]	1	CM	8620 / 3324 (11/12/08)	[illegible]	[illegible]		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information: [illegible] PCB IMPACTED DEBRIS [illegible] BILL TO: VESTS [illegible]
OUT-OF-SERVICE DATE 11/12/08 CONTAINER ID 20-005
ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: THERESA SEYMAN — Signature: Theresa Seyman — Month 11 Day 12 Year 08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: ______
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Mitchell J. Hoat — Signature: [signature] — Month 11 Day 12 Year 08
Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: [signature] — Signature: [signature] — Month 11 Day 13 Year 08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as pcb solid

and specified on Manifest # 000155241 UIS, Line Item 1 has been landfilled on 11/13, 2008 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc.

(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompnying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: _____

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID006102395
2. Page 1 of: 1
3. Emergency Response Phone: (877) 818-0087
4. Manifest Tracking Number: 000155239 VES

5. Generator's Name and Mailing Address: ARCADIS, 126 N JEFFERSON ST, MILWAUKEE, WI 53202

Generator's Site Address (if different than mailing address): MILWAUKEE DIE CASTING, 4132 N HOLTON, MILWAUKEE, WI 53212

Generator's Phone: 414 277-6201

6. Transporter 1 Company Name: ~~[illegible] SPECIAL SERVICES INC~~ Triad Transport Inc.
U.S. EPA ID Number: ~~[illegible]~~ 6KD981588791 (initialed: blm 11/12/08)

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: WAYNE DISPOSAL INC., 49350 N I-94 SERVICE DRIVE, BELLEVILLE, MI 48111
U.S. EPA ID Number: MID048090633

Facility's Phone: 800 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, II, RQ (POLYCHLORINATED BIPHENYLS)	1	CM	8620	K	PCB1		
	2.							
	3.							
	4.							

RECEIVED
NOV 19 2008
ARCADIS

14. Special Handling Instructions and Additional Information: 1) APPROVAL #J084110WDI (#60238/PCB IMPACTED DEBRIS) -|- BILL TO: VESTS-CWD. PO #37485
OUT-OF-SERVICE DATE: 11/12/08 CONTAINER ID #: 20-001
ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Theresa Slyman — Signature: Theresa Slyman — Month 11 Day 12 Year 08

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: ______
Transporter signature (for exports only): ______ Date leaving U.S.: ______

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Mitchell d Hegatt — Signature: [signature] — Month 11 Day 12 Year 08
Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator): U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator): Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Chad Fleury — Signature: [signature] — Month 11 Day 13 Year 08

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

CERTIFICATE OF DISPOSAL

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as pcb solid

and specified on Manifest # 000155239 VES, Line Item 1 has been landfilled on 11/13, 2008 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc.

(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompnying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: _____

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
WID 0 9 6 1 0 2 3 9 5	1	(877) 818-0067	000155046 VES

GENERATOR

5. Generator's Name and Mailing Address
ARCADIS
126 N JEFFERSON ST
MILWAUKEE, WI 53202

Generator's Site Address (if different than mailing address)
MILWAUKEE DIE CASTING
4132 N HOLTON
MILWAUKEE, WI 53212

Generator's Phone: 414 277-6231

6. Transporter 1 Company Name
Triad Transport Inc,

U.S. EPA ID Number
OKD 981558791

7. Transporter 2 Company Name

U.S. EPA ID Number

RECEIVED
NOV 24 2008
ARCADIS

8. Designated Facility Name and Site Address
WAYNE DISPOSAL INC
49350 N I-94 SERVICE DRIVE
BELLEVILLE, MI 48111

U.S. EPA ID Number
MID 0 4 8 0 0 0 8 3 3

Facility's Phone: 800 592-9480

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, II, RQ (POLYCHLORINATED BIPHENYLS)	1	CM	7250	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1) APPROVAL #2084110WDI (#60238/PCB IMPACTED DEBRIS) 2) BILL TO: VESTS
CWD PO #37485. OUT-OF-SERVICE DATE: 11/14/08 UNIQUE CONTAINER ID#: 20-007
ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name	Signature	Month	Day	Year
THERESA SLYMAN	Theresa Slyman	11	14	08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name	Signature	Month	Day	Year
Mitchell J. Hyatt	M J Hyatt	11	14	08
Transporter 2 Printed/Typed Name	Signature	Month	Day	Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☒ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Actual weight: 3245K
OK per Allan Krantz @ Veolia ES As Agent for Generator Manifest Reference Number: 11-18-08 RW

18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name	Signature	Month	Day	Year
Larry Leitz		11	17	08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

CERTIFICATE OF DISPOSAL

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as PCB Solid

and specified on Manifest # 000155046 VES, Line Item 1 has been landfilled on Nov. 20, 2008 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc.

(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompnying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: David Dumouchi

2023 58,150

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
WID006102305	1	(877) 818-0087	000155047 VES

5. Generator's Name and Mailing Address: ARCADIS, 126 N JEFFERSON ST, MILWAUKEE WI 53202

Generator's Site Address (if different than mailing address): MILWAUKEE DIE CASTING, 4132 N HOLTON, MILWAUKEE, WI 53212

DEC 01 2008

ARCADIS

Generator's Phone: 414 277-6204

6. Transporter 1 Company Name: Triad Transport Inc. — U.S. EPA ID Number: OKD981558791

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: WAYNE DISPOSAL INC., 49350 N I-94 SERVICE DRIVE, BELLEVILLE, MI 48111 — U.S. EPA ID Number: MID048090633

Facility's Phone: 800 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, II, RQ (POLYCHLORINATED BIPHENYLS)	1	CM	7250	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: 1) APPROVAL #U084110WDI (#60238/PCB IMPACTED DEBRIS) -- BILL TO: VESTS-CWD, PO #37485, OUT-OF-SERVICE DATE: 11/14/08 UNIQUE CONTAINER ID#: 20-006 ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: THERESA SLYMAN — Signature: Theresa Slyman — Month/Day/Year: 11/14/08

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Mitchell L. Hyatt — Signature: M L Hyatt — Month/Day/Year: 11/14/08
Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☒ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Actual weight: 3245 KM
OK per Allan Rountz @ Veolia ES As Agent for Generator 11-18-08 RW
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H132 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Larry Lehr — Signature: [signature] — Month/Day/Year: 11/17/08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. **DESIGNATED FACILITY TO GENERATOR**

CERTIFICATE OF DISPOSAL

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as PCB Solid

and specified on Manifest # 000155047VES, Line Item 1 has been landfilled on

Nov. 20, 2008 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc.

(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompnying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: David Conrad

2130

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID006102395
2. Page 1 of 1
3. Emergency Response Phone: (877) 818-0087
4. Manifest Tracking Number: **000155250 VES**

5. Generator's Name and Mailing Address: ARCADIS, 126 N JEFFERSON ST, MILWAUKEE, WI 53202
Generator's Phone: 414 277-5231
Generator's Site Address (if different than mailing address): MILWAUKEE DIE CASTING, 4132 N HOLTON, MILWAUKEE WI 53212

6. Transporter 1 Company Name: Veolia ES Industrial Services Inc — U.S. EPA ID Number: TXR000077970
7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: WAYNE DISPOSAL INC., 49350 N I-94 SERVICE DRIVE, BELLEVILLE, MI 48111 — U.S. EPA ID Number: MID048090633
Facility's Phone: 800 592-5489

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, II, RQ (POLYCHLORINATED BIPHENYLS)	1	CM	18,000	K	PCB1
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: 1) APPROVAL #J0811101WDI #80238/PCB IMPACTED DEBRIS) -/- OUT-OF-SERVICE DATE: 12/16/08 UNIQUE CONTAINER ID #: 20-005
BILL TO: VESTS-CMO, PO #6910001971 ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracts by VESTS

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Theresa Slyman — Signature: [signature] — Month Day Year: 12 16 08

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Jeff Hoffmann — Signature: [signature] — Month Day Year: 12 16 08
Transporter 2 Printed/Typed Name: — Signature: — Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: [illegible] — Signature: [signature] — Month Day Year: [illegible]

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

TRANSPORTER'S COPY

CERTIFICATE OF DISPOSAL

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as PCB SOLID

and specified on Manifest # 000155250 VES, Line Item 1 has been landfilled on 12/19, 2008 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc.

(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompnying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: _____

LONESTAR ALTERNATE FUELS

Profile No. TBD
(This number must appear on manifest)
Date Received________

ALTERNATE FUELS PROFILE SHEET

A. GENERATOR INFORMATION

GENERATOR NAME: Milwaukee Die Cast
USEPA ID#: WID006102305
FACILITY ADDRESS: 4132 North Holton
Milwaukee, WI 53212

FACILITY CONTACT: ~~Brian Mallet~~ Ben Verburg
PHONE: (414)~~744-5995~~ 276 FAX: ( )
EMERGENCY 24 HR #: -7742

B. BILLING INFORMATION

COMPANY (IF DIFFERENT): Veolia ES – Technical Solutions
BILLING ADDRESS: W124 N9451 Boundary Road
Menomonee Falls, WI 53051

TECHNICAL CONTACT: Allan Kountz
BILLING CONTACT: Allan Kountz
PHONE: (262)255-6855 FAX: ( )
EMERGENCY 24 HR #: 8

C. MATERIAL INFORMATION (Supply MSDS if available)

[X] Hazardous (RCRA) [ ] Hazardous (DOT) [ ] Non-Hazardous [ ] Comparable Fuel (40 CFR Part 261.38)

DOT Description: Water Soluble Oil
What are the two primary constituents? Water Soluble Liquid Oil *Complete attached waste code checklist.
Process description: Pumping of storage tank from Aluminum Die Casting operation
Primary Designated Disposal Facility: [ ] Cape Girardeau, MO [X] Greencastle, IN [ ] No Preference
Method of Shipment: [X] Bulk Tanker Truck [ ] Drum [ ] Other Specify if other:
Annual quantity 3,000 gallons [ ] On going business [X] One Time Event

D. CHEMICAL AND PHYSICAL PROPERTIES

Color Gray/Red Odor Oily Flash Point >200 F Viscosity <200 cps pH 4-10
Estimated heat value 6,200 (Btu/Lb)
Estimated water content 35 %
Estimated chlorine content <1.0 %
Estimated concentration of sulfur ____ %
Estimated weight 1.1 lbs/gal
Will material be heated? [ ] Yes [X] No

Give the estimated concentration of the following metals (Total)
Lead (Pb) <0.50 ppm Cadmium (Cd) <0.05 ppm
Chromium (Cr) <0.10 ppm Arsenic (As) <0.9 ppm
Mercury (Hg) <0.0010 ppm Antimony (Sb) ____ ppm
Thallium (Tl) ____ ppm Beryllium (Be) ____ ppm
If yes, at what temperature ____ °F

Does this waste contain benzene which is required to be controlled and treated in accordance with the provisions of 40 CFR 61 Subpart FF (61.342(f)(2)?
[ ] Yes [X] No If yes, what is the average benzene concentration ____ ppm

E. CHEMICAL COMPOSITION (List all organic components in the waste stream. Account for 100%)

Compound	Percentage	Compound	Percentage
Water Soluble Oil	100%		
Selenium	0-2 ppm		

WARRANTIES AND CERTIFICATIONS

The following substances *will not* be accepted as an alternative fuel by Lone Star Industries.

Biological wastes	TOSCA regulated materials	Reactive cyanides	Explosives
Infectious wastes	Low Btu materials (<5000 Btu/lb)	Reactive sulfides	> 260 ppm Mercury
Radioactive materials	PCB regulated materials (>40 ppm)	Pyrophoric materials	Incompatible Materials

The term PCB's are used in this warranty to refer to any chemical substances and combinations of substances that contain 50 ppm or greater of PCB's as defined in 40 CFR 261.3. (s), including any by-product, in a process which contains less than 50 ppm PCB's because of any dilution; again these latter shall be included as PCB's. Substances that are regulated by this rule include, but are not limited to, dielectric fluids, contaminated solvents, oils, waste oils, heat transfer fluids, hydraulic fluids, paints, sludge's, slurries, dredge spills, soils, materials contaminated as a result of spills, and other chemical substances or combination of substances, including impurities and by-products. It is unlawful for Lone Star Alternate Fuels to receive PCB's. Any generator and transporter who knowingly or willfully ships PCB's to our facility will be subject to civil penalties and or criminal prosecution. The generator hereby warrants that the materials transferred to Lone Star Alternate Fuels for disposal does not contain PCB's at a concentration greater than 40 ppm when measured in each container or vessel; that the material is not contaminated with PCB's from a source containing 50 ppm or greater PCB's. The generator further warrants that the materials transferred to Lone Star Alternate Fuels for disposal does not contain any of the above mentioned prohibited substances or combinations of those substances, and hereby agrees to indemnify and hold Lone Star Alternate Fuels harmless from any costs, damages or other liability from the breach of this warranty.
The sample submitted is representative of the waste stream, any significant changes to the above described waste steam will require notification and a new Waste Profile Sheet to be submitted prior to shipment. By signature below, the generator or it's duly authorized representative, hereby represents and warrants that to the best of its knowledge the information contained herein is true, accurate and complete in all respects and that all known hazards have been disclosed.

Name: (Please print) Theresa Sleyman Title: Landsmann
Signature: THERESA SLEYMAN Date: 11/27/08

SIGN HERE

EPA WASTE CODES FOR:
(indicate with an 'X' beside waste codes to be sent)

PROFILE NO. TBD

___ D001	___ F007 [1,2]	___ K036	___ K109 [2]	___ P010 [1,2]	___ P068 [1,2]	___ U002	___ U055	___ U107	___ U158 [2]	___ U213
___ D002 [1]	___ F008 [1,2]	___ K037	___ K110 [2]	___ P011 [1,2]	___ P069 [1]	___ U003	___ U056	___ U108	___ U159	___ U214 [2]
___ D003 [1]	___ F009 [1,2]	___ K038 [1,2]	___ K111	___ P012 [1,2]	___ P070 [1,2]	___ U004	___ U057	___ U109 [2]	___ U160	___ U215 [2]
___ D004	___ F010 [1,2]	___ K039 [2]	___ K112	___ P013 [1,2]	___ P071 [1,2]	___ U005	___ U058 [2]	___ U110	___ U161	___ U216 [2]
___ D005	___ F011 [1,2]	___ K040 [1,2]	___ K113	___ P014 [1]	___ P072 [1]	___ U006	___ U059 [2]	___ U111	___ U162	___ U217 [2]
___ D006	___ F012 [1,2]	___ K041 [2]	___ K114	___ P015 [1]	___ P073 [1,2]	___ U007	___ U060 [1,2]	___ U112	___ U163 [2]	___ U218
___ D007	___ F019 [1,2]	___ K042 [2]	___ K115	___ P016 [1]	___ P074 [1,2]	___ U008	___ U061 [1,2]	___ U113	___ U164 [2]	___ U219
___ D008	___ F024	___ K043 [2]	___ K116	___ P017 [1]	___ P075 [1]	___ U009 [1]	___ U062 [2]	___ U114	___ U165	___ U220
___ D009	___ F025 [1,2]	___ K044 [2]	___ K117	___ P018 [1,2]	___ P076 [1,2]	___ U010 [2]	___ U063	___ U115 [1,2]	___ U166	___ U221
X D010	___ F032 [1,2]	___ K045	___ K118	___ P020 [1,2]	___ P077 [1]	___ U011 [2]	___ U064	___ U116 [2]	___ U167	___ U222
___ D011	___ F034	___ K046 [2]	___ K123 [2]	___ P021 [1,2]	___ P078 [1,2]	___ U012	___ U066	___ U117 [1]	___ U168	___ U223 [1]
___ D012 [1,2]	___ F035	___ K047 [2]	___ K124 [2]	___ P022 [1]	___ P081 [1,2]	___ U014 [2]	___ U067	___ U118	___ U169	___ U225
___ D013 [1,2]	___ F037 [1]	___ K048	___ K125 [2]	___ P023 [1]	___ P082 [1]	___ U015 [2]	___ U068	___ U119	___ U170	___ U226
___ D014 [1,2]	___ F038 [1]	___ K049	___ K126 [2]	___ P024 [1]	___ P084 [1]	___ U016	___ U069	___ U120	___ U171	___ U227
___ D015 [1,2]	___ F039 [1]	___ K050	___ K131	___ P026 [1]	___ P085 [1,2]	___ U017	___ U070	___ U121	___ U172	___ U228
___ D016 [1,2]		___ K051	___ K132	___ P027 [1]	___ P087 [1,2]	___ U018	___ U071	___ U122 [1]	___ U173	___ U234 [2]
___ D017 [1,2]	___ K001	___ K052	___ K136	___ P028 [1]	___ P088 [1,2]	___ U019	___ U072	___ U123	___ U174	___ U235
___ D018	___ K002	___ K060	___ K141	___ P029 [1,2]	___ P089 [1,2]	___ U020	___ U073	___ U124 [1]	___ U176	___ U236
___ D019	___ K003	___ K061	___ K142	___ P030 [1,2]	___ P092 [1]	___ U021	___ U074	___ U125	___ U177	___ U237 [2]
___ D020 [1,2]	___ K004	___ K062	___ K143	___ P031 [1,2]	___ P093 [1]	___ U022	___ U075	___ U126	___ U178	___ U238
___ D021	___ K005	___ K064 [2]	___ K144	___ P033 [1,2]	___ P094 [1]	___ U023	___ U076	___ U127	___ U179	___ U239
___ D022	___ K006	___ K065 [2]	___ K145	___ P034 [1]	___ P095 [1,2]	___ U024	___ U077	___ U128	___ U180	___ U240 [2]
___ D023	___ K007	___ K066 [2]	___ K147	___ P036 [1,2]	___ P096 [1,2]	___ U025	___ U078 [1]	___ U129 [1,2]	___ U181	___ U243
___ D024	___ K008	___ K069 [2]	___ K148	___ P037 [1,2]	___ P097 [1,2]	___ U026	___ U079	___ U130	___ U182	___ U244
___ D025	___ K009	___ K071 [1,2]	___ K149	___ P038 [1,2]	___ P098 [1,2]	___ U027	___ U080	___ U131	___ U183	___ U246 [2]
___ D026	___ K010	___ K073 [1,2]	___ K150	___ P039 [1,2]	___ P099 [1,2]	___ U028	___ U081	___ U132	___ U184	___ U247
___ D027	___ K011	___ K083	___ K151	___ P040 [1,2]	___ P101 [1]	___ U029	___ U082	___ U133 [1,2]	___ U185	___ U248 [1,2]
___ D028	___ K013	___ K084 [2]	___ K156 [2]	___ P041 [1,2]	___ P102 [1]	___ U030	___ U083	___ U134 [1,2]	___ U186 [1]	___ U249 [2]
___ D029	___ K014	___ K085	___ K157 [2]	___ P042 [1,2]	___ P103 [1]	___ U031	___ U084	___ U135 [1,2]	___ U187	___ U271 [2]
___ D030	___ K015	___ K086	___ K158 [2]	___ P043 [1]	___ P104 [1,2]	___ U032	___ U085	___ U136 [2]	___ U188	___ U278 [2]
___ D031 [1,2]	___ K016	___ K087	___ K159 [2]	___ P044 [1,2]	___ P105 [1]	___ U033	___ U086 [2]	___ U137	___ U189	___ U279 [2]
___ D032	___ K017	___ K088	___ K161 [2]	___ P045 [1,2]	___ P106 [1,2]	___ U034 [2]	___ U087	___ U138	___ U190	___ U280 [2]
___ D033	___ K018	___ K090 [2]	___ K169	___ P046 [1]	___ P107 [1,2]	___ U035 [2]	___ U088	___ U140	___ U191	___ U328
___ D034	___ K019	___ K091 [2]	___ K170	___ P047 [1]	___ P108 [1,2]	___ U036 [1,2]	___ U089	___ U141	___ U192	___ U353
___ D035	___ K020	___ K093	___ K171	___ P048 [1]	___ P109 [1]	___ U037	___ U090	___ U142 [2]	___ U193 [2]	___ U359
___ D036	___ K021 [1,2]	___ K094	___ K172	___ P049 [1,2]	___ P110 [1]	___ U038	___ U091	___ U143 [2]	___ U194	___ U364 [2]
___ D037	___ K022	___ K095	___ K174 [2]	___ P050 [1,2]	___ P111 [1]	___ U039	___ U092 [1]	___ U144	___ U196	___ U367 [2]
___ D038	___ K023	___ K096	___ K175 [2]	___ P051 [1,2]	___ P112 [1,2]	___ U041 [1]	___ U093	___ U145	___ U197	___ U372 [2]
___ D039	___ K024	___ K097 [1,2]	___ K176	___ P054 [1]	___ P113 [1,2]	___ U042	___ U094	___ U146	___ U200 [2]	___ U373 [2]
___ D040	___ K025	___ K098 [1,2]	___ K177	___ P056 [1,2]	___ P114 [1,2]	___ U043 [1,2]	___ U095	___ U147	___ U201	___ U387 [2]
___ D041	___ K026	___ K099 [2]		___ P057 [1,2]	___ P115 [1,2]	___ U044 [1]	___ U096 [2]	___ U148	___ U202	___ U389 [2]
___ D042	___ K027	___ K100 [2]	___ P001 [1,2]	___ P058 [1,2]	___ P116 [1]	___ U045 [1]	___ U097 [2]	___ U149	___ U203	___ U394 [2]
___ D043	___ K028	___ K101 [2]	___ P002 [1]	___ P059 [1,2]	___ P118 [1]	___ U046 [1]	___ U098 [1,2]	___ U150 [2]	___ U204 [2]	___ U395 [2]
	___ K029	___ K102 [2]	___ P003 [1]	___ P060 [1,2]	___ P119 [1]	___ U047	___ U099 [2]	___ U151 [1,2]	___ U205 [2]	___ U404 [2]
___ F001	___ K030	___ K103	___ P004 [1,2]	___ P062 [1]	___ P120 [1]	___ U048	___ U101	___ U152 [1]	___ U206 [2]	___ U409 [2]
___ F002	___ K031 [2]	___ K104	___ P005 [1]	___ P063 [1,2]	___ P121 [1,2]	___ U049	___ U102	___ U153 [1]	___ U207	___ U410 [2]
___ F003	___ K032 [2]	___ K105	___ P006 [1,2]	___ P064 [1,2]	___ P122 [1,2]	___ U050 [2]	___ U103	___ U154	___ U208	___ U411 [2]
___ F004	___ K033 [2]	___ K106 [1,2]	___ P007 [1]	___ P065 [1,2]	___ P123 [1,2]	___ U051	___ U104	___ U155 [2]	___ U209	
___ F005	___ K034 [2]	___ K107 [2]	___ P008 [1]	___ P066 [1,2]		___ U052	___ U105	___ U156 [1]	___ U210	
___ F006 [1]	___ K035	___ K108 [2]	___ P009 [1,2]	___ P067 [1]	___ U001 [1]	___ U053 [1]	___ U106	___ U157	___ U211	___ NHAZ

[1] Indicates limited acceptance and notification prior to shipment is required.

[2] Indicates acceptance into Greencastle only.

Waste code modifications must be done in writing with advanced notice and approval.

Generator Certification:

Name: THERESA SLYMAN Title: Landowner

Signature: Theresa Slyman Date: 11/19/08

CAS	Compound	Synonym	May Be Present (Check box)	Notification Threshold (lb)	Rejection Threshold (lb)
57-14-7	1,1-Dimethylhydrazine		☐	3,750	15,000
504-60-0	1,3-Pentadiene		☐	2,500	10,000
75-07-0	Acetaldehyde		☐	2,500	10,000
107-02-8	Acrolein	2-Propenal	☐	1,250	5,000
107-13-1	Acrylonitrile	2-Propenenitrile	☐	5,000	20,000
107-18-6	Allyl alcohol	2-Propen-1-ol	☐	3,750	15,000
75-15-0	Carbon disulfide		☐	5,000	20,000
67-66-3	Chloroform	Trichloromethane	☐	5,000	20,000
542-88-1	Chloromethyl ether	Oxybis(chloro) methane	☐	250	1,000
107-30-2	Chloromethyl methly ether	Chloromethoxy methane	☐	1,250	5,000
4170-30-3	Crotonaldehyde	2-Butenal	☐	5,000	20,000
460-19-5	Cyanogen	Ethanedinitrile	☐	2,500	10,000
506-77-4	Cyanogen chloride		☐	2,500	10,000
124-40-3	Dimethylamine	N-methyl-methanamine	☐	2,500	10,000
106-89-8	Epichlorohydrin	Chloromethyl oxirane	☐	5,000	20,000
75-00-3	Ethyl chloride	Chloroethane	☐	2,500	10,000
60-29-7	Ethyl ether	1,1'-Oxybis ethane	☐	2,500	10,000
151-56-4	Ethyleneimine	Aziridine	☐	2,500	10,000
75-21-8	Ethylene oxide	Oxirane	☐	2,500	10,000
7782-41-4	Fluorine		☐	250	1,000
50-00-0	Formaldehyde (solution)		☐	3,750	15,000
110-00-9	Furan		☐	1,250	5,000
302-01-2	Hydrazine		☐	3,750	15,000
74-90-8	Hydrocyanic acid		☐	625	2,500
7664-39-3	Hydrogen fluoride/Hydrofluoric acid (conc >= 50%)		☐	250	1,000
7783-06-4	Hydrogen sulfide		☐	2,500	10,000
126-98-7	Methacrylonitrile	2-Methyl-2-propenenitrile	☐	2,500	10,000
74-87-3	Methyl chloride	Chloromethane	☐	2,500	10,000
79-22-1	Methyl chloroformate	Carbonochloridic acid, methylester	☐	1,250	5,000
60-34-4	Methyl hydrazine		☐	3,750	15,000
624-83-9	Methyl Isocyanate	Methane, isocyanato-	☐	2,500	10,000
74-93-1	Methyl mercaptan	Methanethiol	☐	2,500	10,000
13463-39-3	Nickel carbonyl		☐	250	1,000
10102-43-9	Nitric oxide	Nitrogen Oxide	☐	2,500	10,000
75-44-5	Phosgene	Carbonic dichloride	☐	125	500
7803-51-2	Phosphine	Hydrogen Phosphide	☐	1,250	5,000
107-12-0	Propionitrile	Propanenitrile	☐	2,500	10,000
75-55-8	Propyleneimine	2-Methylaziridine	☐	2,500	10,000
509-14-8	Tetranitromethane		☐	2,500	10,000
26471-62-5	Toluene diisocyanate (unspecified monomer)	1,3-Diisocyanatomethyl benzene	☐	2,500	10,000
75-01-4	Vinyl chloride	Chloroethene	☐	2,500	10,000
75-35-4	Vinylidene chloride	1,1-Dichloro ethene	☐	2,500	10,000
108-05.04	Vinyl Acetate Monomer	Acetic Acid Etyenyl ester	☐	3,750	15,000

(Check the appropriate box below)

☒ Waste to be shipped to Lone Star Alternate Fuels *does not* contain any listed RMP chemicals that exceed any of the above threshhold quantities.

☐ Waste to be shipped to Lone Star Alternate Fuels *may* contain listed RMP chemicals that exceed the notification threshold quantity. Advance notice is required of any RMP chemicals shipped to Lone Star Alternate Fuels that exceed the above specified limits. Materials that exceed the rejection threshold will not be accepted.

Signature: Theresa Pleyman Date: 11/20/08

Company: [illegible] Title: Landowner

SIGN HERE

VEOLIA
ENVIRONMENTAL SERVICES

CONFIRMATION LETTER

December 2, 2008

Mr. Robert Leszczynski
Veolia ES – Industrial Services
1215 Klement Street
Fort Atkinson, WI 53538

Re: Confirmation Letter for Water Soluble Oil Profile

Attention: Mr. Leszczynski

We are pleased to confirm Veolia ES – Technical Solutions, L.L.C. (VESTS) - Controlled Waste Division's approval of your waste material as described below. The attached profile for the waste materials was prepared by Controlled Waste Division based upon information provided by you. It is important that no changes be made to the profile without Controlled Waste's consent. If the profile meets with your approval, please call 1-800-255-5092 to schedule shipment of your waste materials.

VESTS Profile Number:
62536

Approved Mgmt. Facility:
VESTS Controlled Waste Division or another VESTS approved facility

Waste Name:
Water Based Oil

Disposal Method:
Energy Recovery

Profile Expiration Date:
12/02/09

Special Conditions:
All loads must be scheduled forty-eight(48) hours in advance.
Damaged and leaking containers will not be accepted.
A signed and completed Land Disposal Notification and Certification must accompany each shipment, if the waste is hazardous as per RCRA.

Veolia Environmental Services – Technical Solutions, LLC
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
Tel: 262-255-0863 • Fax: 262-255-5794
www.veoliaes.com

VEOLIA
ENVIRONMENTAL SERVICES

*Loads outside minimum requirements are subject to surcharges and may require special scheduling. Surcharge ranges will be based on all or a portion of the percentage increment. Loads with a BTU value less than 2500/lb and/or <40% solvents will be rejected back to the customer, or to an alternate TSD of the customer's choosing.
The customer will be responsible for all transportation arrangements and costs, including demurrage costs incurred while on Lone Star Property. Material with less than 2500 BTU/lb will be rejected back to the customer or an Alternate TSD that the customer chooses. Material must be less than 180 degrees Fahrenheit at time of receipt and must be pumpable (less than 1000 cps).

Applicable state and local taxes are included in these disposal prices. All wastes are priced as profiled, invoiced as actually received. Invoices shall be paid no later than thirty (30) days from the date of receipt. All terms are governed by the Agreement previously executed between our companies. The prices quoted above are subject to *change by VESTS upon thirty (30) days' prior written notice to you unless otherwise specifically provided or per the* terms of our Agreement. If we have not previously concluded a Service Agreement with your company, one is enclosed for your convenience. Please sign and return it to us as soon as possible. Also, if you have not signed the Waste Profile Sheet, please sign and return it before scheduling your material.

If you have any questions or would like to make changes to the profile, please contact your representative.
Thank you for this opportunity to be of service.

Allan G. Kountz

Veolia Environmental Services – Technical Solutions, L.L.C. - Controlled Waste Division

Veolia Environmental Services – Technical Solutions, LLC
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
Tel: 262-255-0863 • Fax: 262-255-5794
www.veoliaes.com

VEOLIA
ENVIRONMENTAL SERVICES

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
WIDOO61O2305	1	(877) 818-0057	000155244 VES

GENERATOR

5. Generator's Name and Mailing Address
ARCADIS
126 N JEFFERSON ST
MILWAUKEE, WI 53202

Generator's Site Address (if different than mailing address)
MILWAUKEE DIE CASTING
4132 N HOLTON
MILWAUKEE, WI 53212

Generator's Phone: 414 277-8281

6. Transporter 1 Company Name: VEOLIA ES TECHNICAL SOLUTIONS — U.S. EPA ID Number: NJD063136890

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: GREENCASTLE WOF FACILITY
3301 SOUTH COUNTY RD. 150 WEST
GREENCASTLE, IN 46135 — U.S. EPA ID Number: INDOO641821 2

Facility's Phone: 765 653-6816

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. NA3082, HAZARDOUS WASTE, LIQUID, n.o.s., (SELENIUM), 9, III	1	TT	2,700	G	D010
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1) APPROVAL #LS 02890 (#62636/WATER-BASED OIL) -I- BILL TO: VESTS-CWD,
PO # 501000 1941 ER Service Contracted by VESTS

103091

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Therese Slyman — Signature: Therese Slyman — Month 12 Day 15 Year 08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: KEVIN D. SCHOUTEN — Signature — Month 12 Day 15 Year 08

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H050			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month 12 Day 16 Year 08

Greencastle WDF Facility

P.O. Box 486, Greencastle, IN 46135
(765) 653-8816

Certificate of Thermal Destruction

Generator: MILWAUKEE DIE CAST

Address: 4132 NORTH HOLTAN

MILWAUKEE, WI 53212

Greencastle WDF Facility, received waste from: MILWAUKEE DIE CAST identified as:

Manifest Number:	***Profile No:***	***Greencastle Load No:***	***lbs Received:***
000155244ves	LS02890	51721	**22240**

And hereby certifies that this material was subsequently destroyed in accordance with the requirements of 40 CFR 268.42 on or about 12/16/2008.

Signed: Craig Christopher

Title: *Alternate Fuels Manager*

Date: 12/17/2008

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

|__| Veolia ES Location MENOMONEE FALLS FACILITY (OFFICE) MENOMONEE FALLS (CITY) WI (ST) |552 | 476 |

|__| Invoice Address

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____

Address 4132 N HOLTON State Wastestream No. _____

City MILWAUKEE State WI Country US ZIP 53212 ____

NAICS(SIC) Code 3363 331521 _____ _____ Source G11 Origin 1 Form W110 System Type _____

2. Waste Name CAUSTIC LIQUID WITH PCBS Lab or Waste Area _____

3. Process Generating Waste

UNUSED/OFF-SPEC PRODUCT

4. Shipping Name WASTE CAUSTIC ALKALI LIQUIDS, n.o.s.

Hazard Class 8 UN/NA No. UN1719 PG II RQ amt 100 lb Waste: Y PIH: N IH: N DWW: N P: N

RQ Des: 1. D002 2. POLYCHLORINATED BIPHENYLS

DOT Des: 1. SODIUM HYDROXIDE 2. _____

5. Waste Codes D002 _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids	
a ___ < 2	a ___ <.8	a ___ < 80	0 - 5% suspended	0 - 0 % ash
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	0 - 5% settleable	0 - 0 % water solubili
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	0 - 5% dissolved	0 - 1000 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200		
e X > 12.5	e ___ > 1.2	e X > 200	Free Liquid	95 -100 %
____ - ____ exact	1.0- 1.5 exact	f ___ no flash ____ - ____ exact	VOC	0 - 0 %

Physical State	Hazardous Characteristics		Odor
s ___ solid	a ___ air reactive	r ___ radioactive or NRC regulated	a none ____
m ___ semi-solid	w ___ water reactive	s ___ shock sensitive	b mild ____
l X liquid	c ___ cyanide reactive	t ___ temp sensitive	c strong ____
p ___ pumpable semi-solid	f ___ sulfide reactive	m ___ polymerization/monomer	describe _____
f ___ flowable powder	e ___ explosive	n ___ OSHA carcinogen	
g ___ gas	o ___ oxidizing acid	i ___ infectious	Halogens
a ___ aerosol	p ___ peroxide former	h ___ inhalation hazard	Br 0 - 0 % Bromine
r ___ pressurized liquid		Zone: _	Cl 0 - 0 % Chlorine
d ___ debris per 40 CFR 268.45			F 0 - 0 % Fluorine
h ___ sharps			I 0 - 0 % Iodine
q ___ pumpable liquid			

Layers: a ___ multilayered: b ___ bi-layered: c ___X single phase

Viscosity by Layer:	Top Layer	Second Layer	Bottom Layer	Color
	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	X low(water)	___ low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

WIP NO. 62177

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ HOC < 1000 ppm ___ HOC > 1000 ppm ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents		Ranges		Units
S,T,U,	POLYCHLORINATED BIPHENYLS (SHIPMENT BY HIGHWAY) LIQUID MIXTU	.00	500.00	M
	SODIUM HYDROXIDE	.00	20.00	%
	WATER	80.00	100.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes X No __
   PCB Concentration 500.00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
    If yes:
    Is the wastestream subject to Notification/Control Requirements? Yes __ No X
    Benzene Concentration .00 ppm
    Does it contain >= 10% water? Yes __ No X
    What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
    Volatile Organic Concentration .00 ppmw
    CC Approved Analytical Method? Yes __ No X
    Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: 55GA1 30 Type/Size: DM 55 Metal DM 11/3/08
11/3/08 Type/Size: SE 30 GAL CLOSED HEAD PLASTIC DF DM 11/3/08 11/3/08

Shipping Frequency: Units 2.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA SLYMAN (Name(Print or Type)) 330-722-5097 (Phone) 11/03/08 (Date)

Theresa Slyman (Signature) Landlaborer (Title)

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 62177

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

|__| Veolia ES Location MENOMONEE FALLS FACILITY | MENOMONEE FALLS | WI | 552 476
|__| Invoice Address OFFICE | CITY | ST

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 427951 Generator EPA ID No. WID006102305

1. Generator Name MILWAUKEE DIE CASTING Generator State No. _____
   Address 4132 N HOLTON State Wastestream No. _____
   City MILWAUKEE State WI Country US ZIP 53212 ____
   NAICS(SIC) Code 3363 331521 _____ _____ Source G11 Origin 1 Form W001 System Type _____

---

2. Waste Name LABPACK CHEMICALS Lab or Waste Area _____
3. Process Generating Waste
   UNUSED/OFF-SPEC PRODUCTS
4. Shipping Name WASTE PACKED LAB CHEMICALS _____
   Hazard Class PLC UN/NA No. NONE PG ___ RQ amt 0 lb Waste: Y PIH: N IH: N DWW: N P: N
   RQ Des: 1. _____ 2. _____
   DOT Des: 1. _____ 2. _____
5. Waste Codes VARI _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____
   Wastewater _____ Non Wastewater X Sub Category _____ Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids
a ___ < 2	a ___ <.8	a ___ < 80	0 - 0% suspended 0 - 0 % ash
b ___ 2 - 5	b ___ .8 - 1.0	b ___ 80 - 100	0 - 0% settleable 0 - 0 % water solubili
c ___ 5 - 9	c ___ 1.0	c ___ 100 - 140	0 - 0% dissolved 0 - 0 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200	
e ___ > 12.5	e ___ > 1.2	e ___ > 200	Free Liquid 0 - 0 %
____ - ____ exact	____ - ____ exact	f X no flash ____ - ____ exact	VOC 0 - 0 %

Physical State

s X solid
m ___ semi-solid
l X liquid
p ___ pumpable semi-solid
f ___ flowable powder
g ___ gas
a ___ aerosol
r ___ pressurized liquid
d ___ debris per 40 CFR 268.45
h ___ sharps
q ___ pumpable liquid

Hazardous Characteristics

a ___ air reactive
w ___ water reactive
c ___ cyanide reactive
f ___ sulfide reactive
e ___ explosive
o ___ oxidizing acid
p ___ peroxide former
r ___ radioactive or NRC regulated
s ___ shock sensitive
t ___ temp sensitive
m ___ polymerization/monomer
n ___ OSHA carcinogen
i ___ infectious
h ___ inhalation hazard
Zone: _

Odor

a none _____
b mild _____
c strong _____
describe _____

Halogens

Br 0 - 0 % Bromine
Cl 0 - 0 % Chlorine
F 0 - 0 % Fluorine
I 0 - 0 % Iodine

Layers: | a ____ multilayered: b X bi-layered: c ____ single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	X low(water)	___ low(water)	___ low(water)	_____
	___ solid	X solid	___ solid	

WIP NO. 62174

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n ___ HOC < 1000 ppm ___ HOC > 1000 ppm ___

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges		Units
LABPACK CHEMICALS	100.00	100.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes X No__
   PCB Concentration 100.00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
    If yes:
    Is the wastestream subject to Notification/Control Requirements? Yes __ No X
    Benzene Concentration .00 ppm
    Does it contain >= 10% water? Yes __ NoX
    What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes __ No X
    Volatile Organic Concentration .00 ppmw
    CC Approved Analytical Method? Yes __ No X
    Generator Knowledge? Yes __ No X
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: 051A1 Type/Size: DM 5 GAL CLOSED HEAD METAL DRUM
051H2 Type/Size: DF 5 GAL OPEN HEAD PLASTIC DRUM

Shipping Frequency: Units 7.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year _ One Time X
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

THERESA A. SLYMAN — Name(Print or Type)
330.722.5097 — Phone
11/8/08 — Date
Theresa Slyman — Signature
Landowner — Title

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 62174

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
WID006102305	2	(877) 818-0087	000155045 VES

RECEIVED
DEC 01 2008

GENERATOR

5. Generator's Name and Mailing Address
ARCADIS
126 N JEFFERSON ST
MILWAUKEE, WI 53202

Generator's Site Address (if different than mailing address)
MILWAUKEE DIE CASTING
4132 N HOLTON
MILWAUKEE, WI 53212

Generator's Phone: 414 277-6231

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: ARCADIS NJD066631389

7. Transporter 2 Company Name
Veolia E.S. Industrial Services
U.S. EPA ID Number: TXR000077970

8. Designated Facility Name and Site Address
VEOLIA ES TECHNICAL SOLUTIONS
HIGHWAY 73
3.5 MILES W. OF TAYLOR'S BAYOU
PORT ARTHUR, TX 77640
U.S. EPA ID Number: TXD000838986

Facility's Phone: 409 736-2821

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1.UN2924, WASTE FLAMMABLE LIQUIDS, CORROSIVE, n.o.s., (PETROLEUM DISTILLATES, SODIUM HYDROXIDE), 3 (8), II, RQ (POLYCHLORINATED	003	DF	00084	K	D001 D003	 OUTS001H	
	2.BIPHENYLS)							
X	3.UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, n.o.s., (PETROLEUM DISTILLATES, SULFIDES), 3 (6.1), II, RQ (POLYCHLORINATED BIPHENYLS)	002	DF	00037	K	D003 D001	 OUTS001H	
X	4.UN1325, WASTE FLAMMABLE SOLIDS, ORGANIC, n.o.s., 4.1, II, RQ (POLYCHLORINATED BIPHENYLS)	001	DF	00026	K	D001 	 OUTS001H	

14. Special Handling Instructions and Additional Information
1) ERG:132 W:62174 A:PTA62174 3) ERG:131 W:62174 A:PTA62174 4) ERG:133 W:62174 A:PTA62174 -|- ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER Service Contracted by VESTS PC155 WI FIELD SERVICES 005 DATE 11/14/2008

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Theresa Slyman
Signature: Theresa Slyman
Month 11 Day 14 Year 08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: David J Szymczak
Signature:
Month 11 Day 14 Year 08

Transporter 2 Printed/Typed Name: Elizabeth Smith
Signature:
Month 11 Day 17 Year 08

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H040	H040	H040	

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Melissa Hefstad
Signature: M. Hefstad
Month 11 Day 24 Year 08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number: WID000102305

22. Page: 2 of 2

23. Manifest Tracking Number: 000155045VES

24. Generator's Name: MILWAUKEE DIE CASTING

25. Transporter 3 Company Name: Veolia ES — U.S. EPA ID Number: IND980613869

26. Transporter ___ Company Name — U.S. EPA ID Number:

GENERATOR

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
X	5. UN1719, WASTE CAUSTIC ALKALI LIQUIDS, n.o.s., (SODIUM HYDROXIDE), 8, II, RQ (D002, POLYCHLORINATED BIPHENYLS)	001	DF	00196	K	D002		OUTS110H
X	6. UN1719, WASTE CAUSTIC ALKALI LIQUIDS, n.o.s., (SODIUM HYDROXIDE), 8, II, RQ (POLYCHLORINATED BIPHENYLS)	004	DF	00053	K	D002		OUTS110H
X	7. UN1719, WASTE CAUSTIC ALKALI LIQUIDS, n.o.s., (SODIUM HYDROXIDE), 8, II, RQ (POLYCHLORINATED BIPHENYLS, D002)	001	DF	00205	K	D002		OUTS110H
X	8. UN1760, WASTE CORROSIVE LIQUIDS, n.o.s., (SODIUM HYDROXIDE, PEROXIDES), 8, II, RQ (POLYCHLORINATED BIPHENYLS)	001	DF	00020	K	D001 D002		OUTS001H

32. Special Handling Instructions and Additional Information
5) ERG:154 W:62177 A:PTA062177 6) ERG:154 W:62177 A:PTA062177 7) ERG:154 W:62177 A:PTA062177 8) ERG:154 W:62174 A:PTA62174

TRANSPORTER

33. Transporter 3 Acknowledgment of Receipt of Materials
Printed/Typed Name: Krystal Dugas — Signature: [signature] — Month 1 Day 19 Year 18

34. Transporter ___ Acknowledgment of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
5. H040 | 6. H040 | 7. H040 | 8. H040

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

VEOLIA
ENVIRONMENTAL SERVICES

Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

MILWAUKEE DIE CASTING
4132 N.HOLTON
MILWAUKEE, WI 53212

ATTN: BEN VERBURG (ARCADIS)

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from MILWAUKEE DIE CASTING (Fed EPA ID - WID006102305) on 11/24/2008 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 000155045VES Veolia ES Technical Solutions, L.L.C. hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 1

Profile Number: PTA62174
Veolia Tracking ID: 618176-01

Process	Veolia Unit ID	Treatment Date	Generator #	Inter-Company #	Date CD Was Issued
INCINERATION	2	12/3/2008	WY1014314001001010	WY1014314001001020	12/5/2008
INCINERATION	1	12/3/2008	WY1014314001001020	WY1014314001001010	12/5/2008
INCINERATION	3	12/3/2008	WY1014314001001030	WY1014314001001030	12/5/2008

Sequence 3

Profile Number: PTA62174
Veolia Tracking ID: 618176-03

Process	Veolia Unit ID	Treatment Date	Generator #	Inter-Company #	Date CD Was Issued
INCINERATION	1	12/3/2008	WY1014314001004010	WY1014314001004010	12/5/2008
INCINERATION	2	12/3/2008	WY1014314001004020	WY1014314001004020	12/5/2008

Sequence 4

Profile Number: PTA62174
Veolia Tracking ID: 618176-04

Process	Veolia Unit ID	Treatment Date	Generator #	Inter-Company #	Date CD Was Issued
INCINERATION	1	12/3/2008	WY1014314001003010	WY1014314001003010	12/5/2008

Sequence 6

Profile Number: PTA062177
Veolia Tracking ID: 618176-06

Process	Veolia Unit ID	Treatment Date	Generator #	Inter-Company #	Date CD Was Issued
INCINERATION	4	12/18/2008	WY1014314001005010	WY1014314001005040	12/23/2008
INCINERATION	1	12/18/2008	WY1014314001005020	WY1014314001005010	12/23/2008
INCINERATION	2	12/18/2008	WY1014314001005030	WY1014314001005020	12/23/2008
INCINERATION	3	12/18/2008	WY1014314001005040	WY1014314001005030	12/23/2008

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

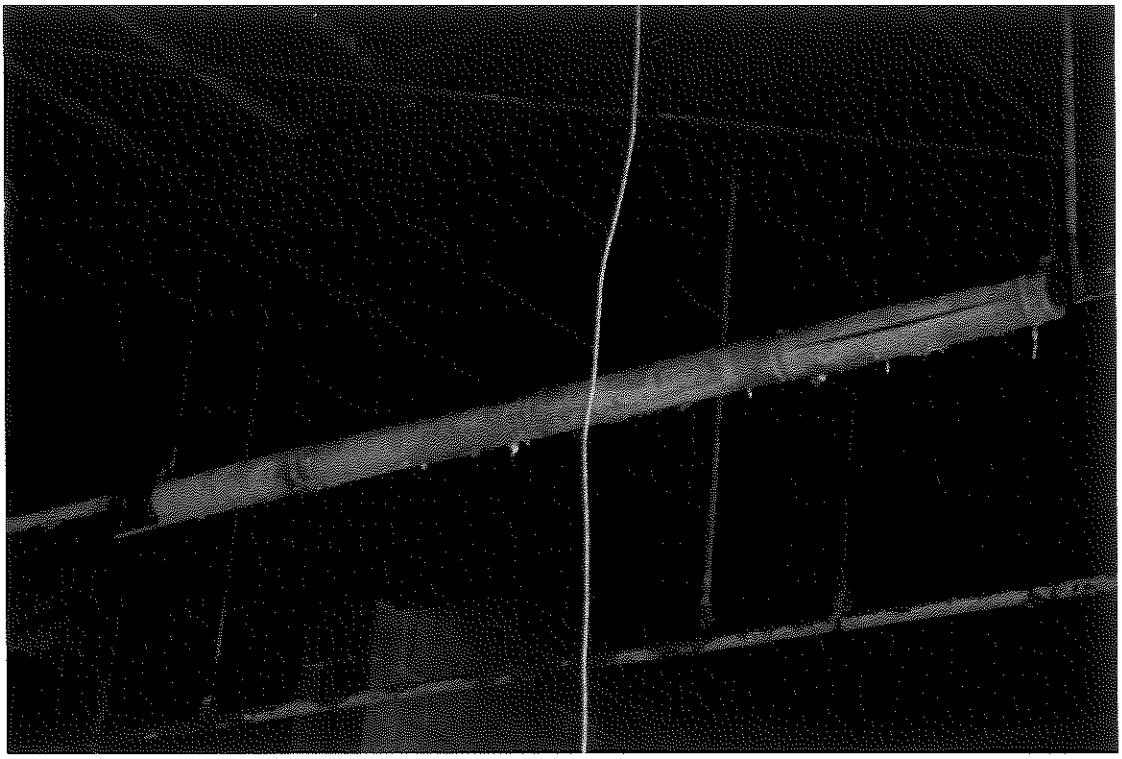
Paul V. Conrad
Material Services Manager

APPENDIX C

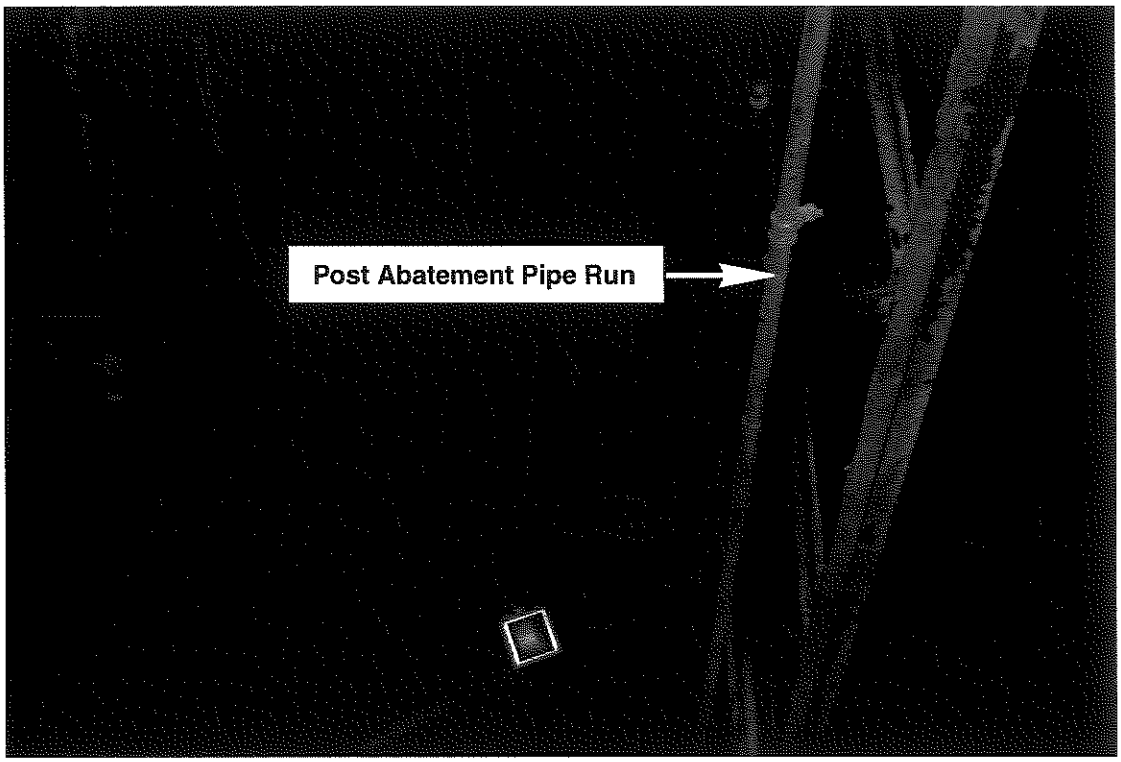
ARCADIS

Appendix C

Photographs



PHOTOGRAPH 1: View of asbestos thermal system insulation on a pipe run in the die cast area.



PHOTOGRAPH 2: View of pipe run in the die cast area following removal of asbestos thermal system insulation.

ARCADIS

PHOTOGRAPH 3: Boiler room wall opening sealed with asbestos hazard sign posting.

PHOTOGRAPH 4: View of north sump prior to decommissioning and sealing activities.

ARCADIS

PHOTOGRAPH 5: Veolia pressure washing north sump.

PHOTOGRAPH 6: View of north sump following decommissioning and sealing activities.

ARCADIS

PHOTOGRAPH 7: Veolia triple rinsing vacuum tanker truck.

PHOTOGRAPH 8: View of drums and boxes stored in the southeastern corner of die cast area.

ARCADIS

PHOTOGRAPH 9: View of concrete floors in the die cast area prior to cleaning.

PHOTOGRAPH 10: Veolia cleaning the die cast area concrete floors, note the resulting clean floor in the background.

ARCADIS

PHOTOGRAPH 11: View of floor sweepings generated from cleaning of the concrete floors in the die cast area.

PHOTOGRAPH 12: Veolia mapping the main tunnels and the main tunnel floor drain.

PHOTOGRAPH 13: View of field waste characterization station.

PHOTOGRAPH 14: View of the transfer of liquid waste streams from drums to storage totes.

PHOTOGRAPH 15: View of the removal of sludge from the northwestern sump.

PHOTOGRAPH 16: View of the northwestern sump following the removal of sludge.

PHOTOGRAPH 17: Typical view of an access tunnel prior to cleaning activities.

PHOTOGRAPH 18: Typical view of an access tunnel following cleaning activities.

ARCADIS

DWG DATE: 19FEB09 | PN: MILDIECASTWI1196\PCBACM_ABAT | FILE NO.:GRAPHICS | DRAWING: PHOTO_PAGE_10.AI | CHECKED: BJM | APPROVED: | DRAFTER: LMB

PHOTOGRAPH 19: View of PCB vacuum tanker truck used to transport PCB oily water for offsite disposal at Veolia's Port Arthur Facility in Texas.

PHOTOGRAPH 20: View of PCB impacted debris in a lined roll-off box.

ARCADIS

PHOTOGRAPH 21: View of lined roll-off boxes with PCB impacted debris loaded for transportation and offsite disposal at EQ Landfill in Bellevue, Michigan.

PHOTOGRAPH 22: View of 13-gallon overpack drums used to transport various 5-gallon containers for offsite disposal at Veolia's Port Arthur facility in Texas.

ARCADIS

PHOTOGRAPH 23: Veolia boarding up windows along the western face of the building.

PHOTOGRAPH 24: View of eastern window covered with plywood boards.

ARCADIS

DWG DATE: 19FEB09 | PN: MILDIECASTWI1196\PCBACM_ABAT | FILE NO.: GRAPHICS | DRAWING: PHOTO_PAGE_12.AI | CHECKED: BJM | APPROVED: | DRAFTER: LMB